Guildford borough Submission
Local Plan: strategy and sites
Regulation 19 consultation representations
(ordered by respondent ID number)
December 2017

Document 3 of 10
Respondent ID numbers 8960097 to 10859969
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A24. The additional housing in the Burpham area is totally untenable. The infrastructure is already at bursting point after the Council's capitulation allowing the Aldi supermarket. To further add to this situation would be madness.

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

Attached documents:

I3 Before ANY further development in this area should even be considered the current mess at the 'Aldi' roundabout plus the A3 situation must be sorted out.

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

Attached documents:
We are writing to formally object to the GBC Local Plan 2016.

Living at a property on Glaziers Lane, Normandy which borders the site between Normandy and Flexford - we will be directly affected by any proposed development of this site.

We understand that the proposal is developer-led and discussions have been taking place with GBC since 2014 to convert this sustainable, currently used agricultural land which is clearly designated within the Green Belt, into a sprawling development to include 1100 homes, a 1500 seat secondary school and retail facilities, doubling the number of homes in Normandy village.

The requirement for a secondary school in this location is highly dubious and must be challenged as it seems that the council is being induced by the developer’s promise to build a 1500 seat secondary school, in exchange for being permitted to build and sell 1100 homes. There is no real case for a secondary school in this part of Guildford’s borough - where will the pupils that will attend this school come from? Not from within the village, even with a doubling of its size. The other nearby secondary schools in Ash and Park Barn are undersubscribed and expansion is planned for other secondary schools in Guildford, so the case for a secondary school in Normandy built on, and wiping out, a large swathe of Surrey’s green belt countryside can only be driven by the profit motivations of the current landowner(s) and the developer.

As the site remains within the Green Belt, it is surprising to learn that, by contemplating this plan, a Conservative-led council would break the election promises of its leadership, which vowed to “always protect the green belt and make sure planning decisions are made by local people.” Clearly, such a planning decision to build on the green belt would not be made by the majority of local people but only by a profiteering few. Furthermore, Cllr Paul Spooner himself is quoted as wishing to ensure “that the interests of local people remain at the heart of all we do.” It is clear that the proposed plan for Normandy/ Flexford does not represent the interests of local people as the majority of local residents are opposed to the development of this site.

Furthermore, the scale of the proposed development is simply unsustainable. There is not enough capacity within the current infrastructure, especially the main roads through the village, to cope with a doubling of its size. As we live on Glaziers Lane, very close to the railway bridge, we feel first-hand the effect of heavy goods vehicles making their way over the narrow, angled bridge. Walking over the bridge is life threatening as vehicles passing over the bridge come within centimetres of the edge of the pavement. It would be irresponsible to propose to expand the village without first having plans in place to improve the infrastructure. The proposed school would also have a substantial impact - traffic would be horrendous at peak times and the effects of the pollution on the ancient woodland and its wildlife would be irreversible. Furthermore, the removal of the wildlife’s habitat would endanger the sustainability of animals that are subject to legal protection.
In summary, the proposed development of this site must be rejected outright as it is disproportionate and unsustainable, endangering wildlife and ancient woodland. It breaks the promises of both the GBC leadership and the conservative party leadership. Even more concerning is that it would eradicate the openness and separation between Flexford and Normandy to create a sprawling conurbation that is completely out of character with the concept of the Green Belt.

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

**Attached documents:**

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**Comment ID:** pslp173/615  **Respondent:** 8961249 / Z A Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham

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

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

This letter is a direct objection to the 2017 house building plans in the Ashgreen, Ash and Tongham area. We understand the need for new housing within these areas; unfortunately the numbers proposed are monstrous.

This is also a letter of rejection to the moving of the Ashgreen boundary just to incorporate the council quota in new builds in the Ash- Tongham boundary. The use of Ashgreen just to make the council house building plan add up is frankly comical. Ash, Tongham and Ashgreen are all separate communities and do not need to be merged just to serve the council or governments planning requirements.

Ashgreen is regarded by all un-sundry as a beautiful rural part of this area, with buildings of Historical importance as well as areas of natural beauty. Ash Manor, a historical farmstead of three listed buildings including a medieval hall house. Ashgreen has not neglected the need for new housing. The main requirement for any expansion of Ashgreen is the fact that any building work undertaken is moderate and within the keeping and character of the area.

The four main objections to the council housing plans are;

- The number of houses proposed.
- The moving of the boundary to accommodate the council numbers.
- The lack of any plans regarding the infrastructure such as roads, schools, and other amenities required to make a housing project of this size safe, viable and of benefit to the present community.
- The Flooding. This could be an issue. The residents of Ashgreen already deal with huge amounts of coming of the A31 the Hogs Back. Recently a bund has been constructed to relieve any flow of water from the hills looking down on Ashgreen. New builds in great numbers and in areas surrounding Ashgreen could in future have a detrimental effect on the houses and surroundings of Ashgreen.

So these are our four main reasons for opposing the build.

**Point 1**

A suicidal number 1750 of houses being built in and around one of the busiest transport hubs in the South of England. Access to the A31 -331-A3-M25 and M3 are all heavily congested and frequently at a standstill due to accidents and the volume of traffic. So traffic from these main roads will regularly use White lane, Foreman Road and Ashgreen road which are narrow roads, without foot paths and are used for a cut through to get towards Guildford Hospital etc. This could be an additional 3700 cars on these rural roads and would be dangerous and very unsafe.
Point 2

We have a deep contempt to the council’s underhand movement of the boundary that they can justify to the government that the planning proposals for this area are on track this is scandalous.

Point 3

To build the number of houses proposed and with no plans for the infrastructure within this area we feel is crazy. All the main roads are heavy with traffic virtually every day from early in the morning. You plan to build in an area where of all roads leading to the main transport links are totally unsuitable for purpose. The roads in and around Ashgreen are narrow mostly without footpaths and are also used by cyclists, walkers and horse riders. Placing such a large number of new homes in an area with already overloaded roads, a lack of schools, surgeries and other important amenities is a recipe for disaster with no planning of any kind for the infrastructure.

Point 4

We live in Drovers Way Ashgreen we have been here thirteen years our garden is never dry even at the hottest time of the year we feel the building of so many houses could cause a problem with the natural flow of water coming of the hogs back. The building of so many houses could lead to areas of Ashgreen having problems with flooding because the water cannot run its natural course. The Ashgreen bund has recently been built to alleviate any potential flooding problems so why would you want to build so many houses with the possibility of causing potential flooding problems.

Our Conclusion

The high number of new houses proposed for the Ashgreen, Ash and Tongham are totally unreasonable because of some of the points highlighted in this letter. As we understand things there are no proposals for building in Normandy why? This is an unjust and unfair plan by the council to destroy the lives livelihoods and a reasonable way of life in ASHGREEN, ASH AND TONGHAM.

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

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

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"
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Attached documents:

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Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:

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Comment ID: PSLPA16/2538  Respondent: 8961889 / F Turner  Agent:

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

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

APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/2541  Respondent: 8961889 / F Turner  Agent:

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

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

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

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

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

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

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

Attached documents:

Comment ID: PSLPA16/2535  Respondent: 8961889 / F Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Note the following accident data:

2010 –2014 from Crashmap data

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

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

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

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

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

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

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

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

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

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

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

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

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

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

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

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

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

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

Attached documents:

**Comment ID:** PSLPS16/5250  **Respondent:** 8961889 / F Turner  **Agent:**

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

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

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

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

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

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

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

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

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

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

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

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

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

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

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

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

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

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

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

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

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

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

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

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

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

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

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

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

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

Attached documents:

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Comment ID: SQLP16/1329   Respondent: 8961889 / F Turner   Agent:

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

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

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

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

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

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

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

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

Attached documents:

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Comment ID: SQLP16/1332  Respondent: 8961889 / F Turner  Agent:

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

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

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

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

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

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

Attached documents:

Comment ID: SQLP16/1335    Respondent: 8961889 / F Turner    Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

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

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

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

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

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

**Attached documents:**

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

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

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

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

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

**Attached documents:**
West Horsley should be kept within the Green belt for the following reasons:

1. It is within the flood plain of the Hogs back and suffers severe flooding when heavy rain occurs, we hence need to restrain building and allow open green space to absorb the water.
2. The local population has no demand for large houses with developers making profits, sometimes with the promised, often ignored, of providing infrastructure. The only demand in W.H. is for small houses for Down – Sizing for older people and young village people to live in and not to provide for immigrants from London and who will not be part of village life but work in London and commute daily on the congested and polluted A3 and M25 or over loaded trains.
3. The demand for housing is in London where many properties are empty and owned not for living in but as investment or to provide safe havens for foreigners when life in their own countries becomes difficult. West Horsley is an historic village with ancient woodland many listed buildings, both medieval and more modern heritage
4. Open land is required for agriculture grazing horse riding, rural activities, cycling (W.H. is on the route for the well-known prudential cycle race). Being near the famous RHS Wisley gardens WH continues the Green Lung needed for wild life such as cuckoos swallows barn owls etc.
5. The green belt was instigated to stop urban sprawl which is exactly what is proposed now by GBC in its local plan. The recent referendum shows that people will react in the end when the establishment ignores the wishes of the majority. West Horsley and the surrounding villages say no, no, no to building in the green belt.

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

Attached documents:

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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/1309  Respondent: 8962881 / D A Middleton  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/7471  Respondent: 8962977 / Lizzie J Spinks  Agent:

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

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

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

I strongly object to Guildford Borough Council’s Draft Local Plan June 2016.

It would ruin what makes Guildford and Surrey special, the lovely amount of green we live amongst.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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

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Comment ID: pslp172/1216  Respondent: 8964481 / C Hone  Agent:
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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/4325  Respondent: 8964897 / K M Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

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

• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend to: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend to: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- Policy P3 Amend to: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

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

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Attached documents:

Comment ID: pslp172/4328  Respondent: 8964929 / C.J. Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

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

Correct title of Policy A28 to say Ash Green, and not Ash.

• Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

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Attached documents:

Comment ID: pslp172/4327  Respondent: 8964929 / C.J. Bannister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
  
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**Attached documents:**
Policy P3 - Countryside

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- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

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

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

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

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

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

Attached documents:

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Comment ID: pslp172/4910  Respondent: 8966081 / Tanya Hebberd  Agent:

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

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

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

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

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

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

Attached documents:

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Comment ID: pslp172/1608  Respondent: 8966177 / Michael Bryant  Agent:

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

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

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

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

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

Attached documents:

Comment ID: pslp172/5309  Respondent: 8966177 / Michael Bryant  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
a) The Street in Tongham  
b) A331/A323 intersection  
c) A31 /White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**

**Comment ID:** pslp171/3340  
**Respondent:** 8966177 / Michael Bryant  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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

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

**Policy P3 - Countryside**

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, a Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: PSLPA16/4233  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

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

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

The University is concerned that the glossary entry for “Green Belt” is misleading as it does not correctly define the term. The definition in the glossary states that it is a statutory designation, which is not the case. Green belt is a policy instrument and is not statutory.

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

Attached documents:

Comment ID: PSLPA16/4522  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Strategic Highway Assessment Report

The Strategic Highway Assessment Report (SHA) presents the findings of a technical assessment by SCC using their strategic transport model (SINTRAM) of the worst case highway impacts of the quantum and location of development set out in the Proposed Submission Local Plan.

It assesses forecast impacts on the strategic highway network in 2031, taking into consideration key local highway schemes, as well as strategic schemes included in the Department for Transport’s Road Investment Strategy (RIS) (March 2015) for Road Period 1 (M25 junction improvements) and Road Period 2 (A3 widening through Guildford).

We note that, while recognising that it is a highway-only assessment that does not take into account the potential for mode shift due to investment in sustainable travel, the SHA concludes that, “to accommodate Proposed Submission Local Plan-related vehicular trips the DfT’s RIS schemes would be required.” It also concludes that, “to avoid (severe impact) occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended.”

The University has identified a number of technical concerns that may call into question the findings and ultimate conclusions of the SHA. These are set out below:

- The trip generation for the large sites does not include any consideration of the effect of pass-by and diverted trips or of the effect of internal trip. For a development the size of Blackwell Farm, with a mix of uses that are likely to result in significant internalisation of trips, the overall trip generation should be reduced to reflect these factors. Taken together with the other large sites with mixed uses such as Gosden Farm, Wisley Airfield and the land to the south of Normandy and north of Flexford, the overestimation is likely to be several hundred vehicle trips in each peak. The SHA acknowledges that the large sites will generate trips that are wholly contained within their boundaries, for example school trips.
- The SHA does not take account of the reduction in car trips likely to come about as a result of improved sustainable transport measures. The SHA notes the positive impact of these measures at paragraph 4.18 and states that the “impact of these sustainable transport schemes is expected to be significant”
- The SHA appears to underplay the benefits of local highway improvements in Scenario 3, which, for example, result in a reduction in vehicle kilometres in both peaks as fewer vehicles take indirect routes on the local road network to avoid congestion getting onto the trunk road network.
- The SHA attaches limited weight to the negative effects of Scenario 5 in terms of increased car use overall attracted by the provision of additional capacity on the strategic network. The capacity improvements appear to attract additional vehicles to the network that are unrelated to development.
- Blackwell Farm creates fewer areas of new congestion on the highway network, in contrast to the other major development sites, although the impacts around the hospital need careful consideration.
- Detailed assessment work for any future applications will identify additional locations for local highway improvements and other mitigation measures, which are not considered in the SHA, but which may further reduce the impacts of development.

Furthermore, the University believes that the broader sustainable transport benefits of development at Blackwell Farm should be considered and acknowledged. These include:

- The ability to deliver homes, employment, schools and a mix of other uses on a single site that is uniquely well located in comparison with the other major sites
- Proximity to existing high frequency public transport services and to the university, hospital and other existing employment uses, reducing the need to travel by car
- The potential to support delivery of a new rail station on the North Downs Line providing direct services from West Guildford to Guildford, Reading and Gatwick Airport
- A masterplan that encourages non-car travel by providing a fine grained network of walking and cycling routes, home zone principles in all residential streets and primary streets that accommodate generous footways, new bus services and the Sustainable Movement Corridor
- The allocation of a significant proportion of homes for those that live and work locally (at the University, research park and hospital), further reducing the need to commute by car
• Local centres that will provide a range of services and facilities (such as shops, cycle hire, remote office hubs, courier drop/collection points, cafés and meeting spaces), further reducing the need to travel outside the site
• Parking measures to help with travel demand management, such as priority parking for car sharing at offices, car club bays and electric charging points
• A scale of development that will allow for the implementation of other innovative schemes, such as the creation of a smart travel network that links smart devices and on-demand vehicles via an easy to use app and provides a service around the site and to local areas

In summary, the SHA focuses exclusively on worst case highway impact and does not take into account the significant reductions in car use achievable from mode shift as part of the other Local Plan evidence base work and our strategy for Blackwell Farm or of internalisation of trips. Moreover, the consequences of encouraging substantial additional car use in terms of reduced environmental quality, increased CO2 (around 25,000 additional tons of CO2 per year in comparison to the baseline) and encouraging more car based patterns of travel are not considered.

The Local Plan should reflect the fact that highway infrastructure requirements set out are based on a worst case assessment of highway impacts and that there must be flexibility in delivery. This should be reflected in the Local Plan Vision and in Policy I1 and Appendix C.

Nevertheless, the University recognises that further, more detailed assessment work will be required ahead of examination, such as identifying at what point widening of the A3 is triggered and what development can come forward ahead of this. In this regard, it will endeavour to provide technical assistance to GBC, SCC and Highways England wherever possible.

Topic Paper: Transport

Appendix 4: Table showing the anticipated funding arrangements for transport schemes

The University notes the infrastructure requirements identified in relation to Blackwell Farm (A26) in Appendix 4 of Topic Paper: Transport (and summarised in Appendix C of the Proposed Submission Local Plan) and makes the following comments in relation to these:

NR2: New rail station at Guildford West (Park Barn)

The University is fully supportive of the provision of a new rail station on the North Downs Line at Guildford West (Park Barn) and has provided technical support to GBC and Network Rail to enable a business case for this scheme to be developed.

The preferred location currently being promoted by GBC (the scheme sponsor) is adjacent to the Royal Surrey County Hospital near Egerton Road. This is now some distance from the development at Blackwell Farm, compared to the location previously proposed by the University, and therefore will be of direct if not greater benefit to the hospital and nearby development at Park Barn.

The University therefore anticipates part-funding the delivery of the station through a S106 contribution related to the development at Blackwell Farm, rather than fully funding this as suggested in the infrastructure schedule.

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

Attached documents:

Comment ID: PSLPP16/17292  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

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

Paragraphs 2.8 – 2.10

In paragraphs 2.8 – 2.10 under the heading “Key facts about the Borough” the plan provides an outline of jobs and employment.

The University supports the addition of text in paragraph 2.9, which explains that “The University of Surrey is also a significant employer in the borough.” However, the University considers that this statement could be strengthened to also make specific reference to the contribution that the Surrey Research Park makes to the borough. The following amended wording is therefore proposed:

“The University of Surrey and companies on the Surrey Research Park are also significant employers in the borough that provide for and secure the future of high technology companies in Guildford.”

There is a demand for good quality new employment space in Guildford, especially in the western part of the town to support the continued growth and success of the University and the Surrey Research Park.

The presence of the University and the Surrey Research Park have helped to diversify the region’s economic base by adding technology jobs to the public, retail and service sector employment in the region.

The University has mitigated its impact on Guildford with investment in public transport, on-site accommodation for students and, with the Surrey Research Park, putting about £1.7 billion into the UK economy every year. This includes about £950 million in Guildford borough.

The University notes and welcomes that the plan allocates land at Blackwell Farm (Policy A26) for new development as a sustainable extension to the town, to include land on which to extend the Surrey Research Park. This provision, along with the ongoing development of the University of Surrey at Manor Park, will provide a very strong base on which to develop Guildford’s contribution to the national economy.

The University agrees with the view expressed in paragraph 2.10 that many workers are unable to afford homes close to work, and considers that there is an urgent need to address this problem that risks undermining Guildford’s future prosperity. It is an issue which directly and detrimentally affects the University as an employer that relies on lower paid staff, many of whom are young, highly qualified researchers. This is an important task for the local plan, which should provide for more new homes to be built to increase supply, so that house prices do not continue to accelerate beyond growth in salaries.

Paragraphs 2.11 – 2.15

Paragraphs 2.11 – 2.15 under the heading “Key facts about the Borough” of the plan provide a broad outline of transport and accessibility issues.

The University experiences the issues associated with traffic congestion and sees the need to locate new development close to existing facilities and services, in locations that promote (and do not undermine) sustainable modes of travel and that can deliver improvements to key transport infrastructure.

The allocation of sites for new development should take into account sustainable travel. This suggests a focus on the town of Guildford, particularly locations close to the major employment and service hubs such as the town centre and to the west of the town around the University, Surrey Research Park and Royal Surrey County Hospital.

This cluster of activity in the western part of the town is already linked to the town centre by an existing high quality public transport corridor, and is identified by the borough Council as lying at one end of a Sustainable Movement Corridor that it
is seeking to promote and upgrade. Development in locations that can link to and integrate with the Sustainable Movement Corridor should be favoured, and hence additional development adjacent to the University and the Surrey Research Park is appropriate. More remote locations, where services are limited, and the use of the private car to access services, employment and facilities in the town is more likely, should have lower priority.

**Paragraphs 2.16 – 2.21**

In paragraphs 2.16 – 2.21 under the heading “Key facts about the Borough” the plan provides a broad outline of housing issues.

The University agrees that housing is an issue of significant importance to the borough and that an appropriate amount must be provided to cater for the objectively assessed level of need. The University broadly welcomes the work that has been carried out on the evidence base in this area.

It is noted that the level of housing (13,860 new homes) that the borough is planning for equates to 693 dwellings per annum when spread over the 20 year plan period, which accords with the objectively assessed need identified for Guildford in the West Surrey Strategic Housing Market Assessment (SHMA) published in October 2015.

However, the University considers that the 13,860 homes figure should be regarded as a minimum (i.e. at least 13,860). This would not preclude additional sustainable development from coming forward during the plan period where it could be demonstrated that this made a positive contribution towards meeting the borough’s needs and if allocated sites were not likely to be delivered during the plan period. It would also allow the opportunity to address matters such as potentially increasing pressure to respond to changing housing needs arising from London. The University does not believe that the recent Brexit referendum result would justify reducing the housing number. Guildford is part of the South East and London and the South East are vibrant areas with significant existing housing deficits which are also showing very significant economic and population growth.

The University notes the commentary in paragraph 2.21 on house prices and affordability, and considers that high house prices associated with lack of housing supply have created an affordability problem that is leading to skill shortages in the borough. This is impacting upon the ability of the University and high technology businesses at the Surrey Research Park (and across the borough as a whole) to attract and retain the high quality staff required to underpin prosperity and success now and in the future.

The University also notes that salaries are too low to allow many people who are employed in Guildford to access the housing market in the town, which leads to many people travelling longer distances than they would wish to from more affordable locations. This practice is not sustainable as it leads to more traffic and associated congestion on the road network, and brings with it increased vehicle emissions and other impacts on the environment. There are also societal and economic impacts arising from the time spent and the cost of commuting that could be reduced if people had greater opportunities to live closer to their place of work. Continued failure to bring housing provision closer to need will exacerbate these problems. It is therefore important that the local plan is adopted without delay and provides for at least the objectively assessed need.

**Paragraph 2.22**

In paragraph 2.22 under the heading “Key facts about the Borough” the plan provides a broad outline of infrastructure issues.

The University is aware of the pressures on existing infrastructure in the town and wider borough. The University considers that new development can help to overcome existing infrastructure problems and deficits by providing additional investment. This is best achieved through large strategic developments that can provide new housing and employment along with new services and community facilities, and are large enough to fund infrastructure upgrades, rather than through a scatter of sporadic and piecemeal development that would contribute relatively little in this respect.

The University also considers that a pragmatic approach must be taken to phasing of development alongside infrastructure provision so that a proportion of new homes can be provided on strategic sites, where it is appropriate to do so, in advance of the completion of major infrastructure investment.
Paragraphs 2.27 – 2.28

In paragraphs 2.27-2.28 under the heading “Key facts about the Borough” the plan provides a broad outline of competing and conflicting demands.

The University agrees that there is a careful balance to be struck between meeting development needs and protecting the environment. The University therefore supports the proposed approach to a controlled realignment of the green belt boundary and the development of a small number of large strategic sites that are well located on the edge of the existing urban areas and with regard to existing transport corridors. Such strategic sites are best placed to provide a mix of development and to generate investment in appropriate facilities to meet their local needs supported by new and upgraded infrastructure. These strategic sites can better offer a high quality design focused on people, place and natural capital.

Key diagram

The University notes that land at Blackwell Farm is identified on the Key Diagram as a “Strategic Development Site” (SDS).

However, the boundary of the site in the Key Diagram does not match that shown on page 185 of the plan, which is associated with policy A26. Specifically, it seems that the north western part of the allocation, whilst shown as inset from the green belt, has not been outlined with the SDS notation. There should be an amendment to the Key Diagram to include the north western area within the SDS boundary.

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

Attached documents:

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Comment ID: PSLPS16/7858  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A16

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

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

The University notes the proposed allocation of Land between Gill Avenue and Franklin Close for approximately 450 homes, potentially including some student accommodation.

The University supports, in principle, the potential for the delivery of some student accommodation as part of this allocation, which would result in the provision of additional accommodation that could be available to meet the University’s growing student population.

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

Attached documents:

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Comment ID: PSLPS16/7859  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A17

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The University supports this allocation for hospital-related development, provided the impact on the local highway network is taken fully into consideration.

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

Attached documents:

Comment ID: PSLPS16/7860  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

The University supports the allocation of land at Blackwell Farm for mixed use development.

The site is an exceptional opportunity to deliver a mixed use sustainable new community, taking advantage of its location on the western edge of the town of Guildford to deliver new homes next to both existing and new employment opportunities and with excellent non-car movement links. It has characteristics that are well suited to a high quality residential environment that integrates with the existing town and makes best use of the natural features on and around the site. The University firmly believes this is an opportunity not to be missed to plan positively and creatively, to make a place that the town and the University can be proud of.

The University supports the principle of providing urban extensions to Guildford as part of a sustainable development strategy. The level of the objectively assessed need in the borough is such that it cannot be accommodated only by using previously developed sites and sites within the existing urban areas. The strategy must include extensions to the main urban area in the borough so that homes are provided close to the existing employment, services and facilities in the town. There are no reasonable alternatives to meeting the local plan’s development strategy that do not involve extending settlements, and hence altering the green belt boundary.

This is the basis for the exceptional circumstances that underpin the alterations to the green belt boundary through the local plan.

In this context the University firmly believes that the allocation of land at Blackwell Farm provides a significant sustainability benefit. It is large enough to provide a significant number of new homes and associated services and facilities, as well as to fund new infrastructure and improvements to existing infrastructure that will benefit the town.

In particular it lies adjacent to the existing large cluster of employment, services and facilities on the western side of the town leading to a strong likelihood that sustainable modes of travel will be used by new residents to access the existing employment opportunities, services and facilities as well as those to be provided on site.
The Blackwell Farm site is integrated with the western end of the town’s proposed sustainable movement corridor which further emphasises the ability of the site to provide new residents with realistic opportunities to walk, cycle or use public transport to go about their daily lives.

The successful Surrey Research Park is a major asset to Guildford’s economy but is now almost full as the last available development plots are being developed. The Blackwell Farm site provides potential for an extension to the Park to build on its economic success, which has been and continues to be an important element of the growth and prosperity that Guildford enjoys and will continue to enjoy with this extension. The ability to extend the Park is an important factor in support of the allocation of the site through Policy A26.

In addition, the University itself is a major asset to the town and borough, not just educationally and economically but also through the cultural, sporting and social opportunities and facilities it provides.

The University brings a wide range of benefits to individual students and to society as a whole through the quality of the education it offers and of the graduates and postgraduates it produces, as well as through the dissemination and practical application of its research.

However, like all modern universities in the UK, it is expected to provide more than just high quality higher education and research. The University is also an important and powerful engine of economic growth. It is involved in social change, and provides numerous opportunities for cultural enhancement. It is a leading institution in the local community, and its students and staff use many types of local services and businesses and add to the diversity of the area.

The University’s people, both staff and students, have a significant presence in volunteer work in the town and borough, supporting many parts of the community and being active in a range of community groups. Many graduates of the University bring their skills to the local job market (and indeed many more would also do so if the housing market was more affordable to young graduates).

Of course the University itself is one of the largest employers in Surrey. When combined with the Surrey Research Park, and looking at direct and indirect contributions together, the University and the Park contribute about £1.7 billion to the UK economy and support over 17,000 UK jobs (over 10,600 of which are in Guildford).

Many of the University’s facilities in the town are used by and valued by the local community for the educational, sporting, social and cultural opportunities they provide.

Given that Blackwell Farm is owned outright by the University, there is an opportunity to generate returns for the University, which will allow the University to reinvest receipts in its facilities, and hence in the town. There is currently and will be for the forseeable future a constrained funding environment. The returns from development at Blackwell Farm therefore provide real potential to help the University to maintain its position and realise its future plans.

These plans include the potential for the University to:

- Replace and/or refurbish building stock. The University has about 73,500 sq m of non-residential space and about 1,700 bed spaces designed and constructed between 1965 and 1972 that require replacement or refurbishment over the next 20 year period
- Plan and build a new conference centre for the University and the wider community on land already with outline planning permission for academic and supporting development at Manor Park
- Accelerate the building programme for student residences at Manor Park. There is outline planning permission for about 2,000 bed spaces at Manor Park (subject to detailed planning) that are dependent on funding to bring them forward. The University currently has a live planning application for the next 900 beds, and is expecting the determination of the application at any point, although funding is needed to bring these forward and indeed for the next tranche up to the limit allowed by the existing outline permission
- Plan and build academic buildings on land already with outline planning permission for academic and supporting development at Manor Park. The University considers that this would help to elevate its international position and assist in positioning the University to join the Russell Group of leading UK universities, which are committed to maintaining the very best research, an outstanding teaching and learning experience and unrivalled links with business and the public sector.
• Plan and build academic buildings for satellite engineering, communications system engineering, a business school or school for Hospitality and Tourism, and a potential Medical School and other investment in biomedical sciences, to enhance core areas of the University’s strengths and further enhance its position internationally and in relation to Russell Group membership. Whilst Government policy is that higher education is a key priority for growth and there is Government support for universities and the encouragement of innovation, Government funding for this type of investment is declining and funding arrangements generally have become more complex. Revenue from academic fees and other sources is not guaranteed to meet the level of investment required to achieve the University’s aims in the areas outlined above. Alternative streams of funding are therefore important to securing the future of the University.

The University’s sole ownership of the site is also an advantage in bringing the site forward for delivery of homes. This sole ownership provides greater confidence of delivery. The fact that the University is also a world class Guildford institution, rooted in the town and the borough, with a significant stake in the future of Guildford, is very relevant.

It is important and significant that the University intends to retain control over the development and the land, providing long term stewardship, and acting as a trusted custodian of the land and the homes it will deliver, to control quality and future management of the site. This is in marked contrast to the usual developer-led housing model where the same level of control and long term stewardship could not be achieved.

Above all the University has three key delivery goals that reflect its place as an important part of Guildford now and in the future:

• Firstly, to create a place to be proud of, so that in the future, looking back, it can be seen to have been the right thing to do and matches the aspirations of the local plan
• Secondly, to create a place of high quality on the land neighbouring its campus and research park, so that it protects and enhances what has already been achieved
• Thirdly, to create a place of lasting value to the fabric and community of the town.
• A new access to the A31 will allow access to and from the Surrey Research Park and the Royal Surrey County Hospital directly from the A31 without joining the A3 and passing through the congested local highway network around the Tesco roundabout and Egerton Road junction. Indeed by diverting some of the A31 traffic it will help to control this congestion.

Good permeability for pedestrians, cyclists and public transport will further provide opportunities for reducing congestion as the new homes on the site can be expected to be particularly attractive to those who work at the University, the Surrey Research Park and the hospital, who will all be within walking and cycling distance of these workplaces, and on an excellent public transport route.

Occupants of the affordable housing in particular can be expected to be local people with local workplaces, particularly so if it is possible to secure some of the affordable housing quota specifically for University, SRP and RSCH key workers through the use of eligibility criteria based on a formula linking rent to salary.

This means that the development of Blackwell Farm offers the University the opportunity to provide tied accommodation for rent to young staff that come to Guildford on short contracts. The benefits are manifold; firstly it makes it easier to recruit the best staff to carry out research and teaching to the benefit of all, by providing housing that is affordable to these staff in a market that is generally not affordable to them. Secondly, it means these staff will not be competing in the open private rental market in the town, so reducing the pressure on this market arising from the University. Thirdly it means these staff will have their homes close to their place of work and thereby reduce commuting time and costs.

Some have argued that the University can achieve this through its existing outline permission for Manor Park. However, initial attempts to provide staff housing have not been successful as staff generally, and understandably, prefer to live away from the campus and the student residences, in more traditional family housing areas. Units built to date for staff at Manor Park are therefore generally lived in by students as staff have declined to take them up. This does mean of course that any staff beds at Manor Park have been reassigned to students so making full use of the accommodation available.
The details of the potential ‘tied’ accommodation scheme have yet to be worked out in full. This will need to consider matters such as the numbers of staff likely to be involved, the eligibility criteria and levels of rent, and the relationship of this tied housing to the affordable housing quota. However, what is clear is that it is unlikely to be possible to achieve this on a site not owned by the University, so it is a unique opportunity for this site.

All of the above means that Blackwell Farm therefore provides a significant opportunity to provide a truly sustainable extension to the town. For this reason Blackwell Farm should be the first site on the list of urban extensions around the town, to reflect its superior ability to provide sustainable development when compared with other sites.

The University has reservations about the methodology and conduct of the Green Belt and Countryside Study (GBCS), that has been used in the identification of sites for the plan. Leaving aside these reservations, the allocation of Blackwell Farm is sound for good reasons relating to its lack of environmental constraints, highly sustainable location, availability and deliverability. However, should the study be debated at the public examination of the plan, the University would like to be present to put forward its views.

The University has additional land at Blackwell Farm that can provide additional capacity for development that should be allocated as safeguarded land to provide longer term flexibility and help meet future needs beyond the plan period without needing to alter green belt boundaries again. This lies immediately to the west of the draft allocation and will provide another 800 homes plus other facilities and services. This includes potential for a new secondary school to serve the western side of Guildford.

The University believes that the allocation of sites outside the existing urban areas should be predicated on their suitability to provide sustainable development opportunities to help meet the development strategy of the plan, rather than over-reliance of green belt scoring used in the analysis in the GBCS.

However, the University notes that its additional land is part of parcels H3 and H4 of the GBCS, which are adjacent to, and scored similarly to or better than (in terms of green belt sensitivity) parcel H2 that forms the basis of the draft allocation. Hence insofar as it is relevant, the GBCS scoring would support the potential of the land as safeguarded land.

This land, being adjacent to the new urban edge of the Policy A26 site, would be preferable to less sustainable sites in locations away from the town. It would also:

- Provide additional development in general that would increase the ability to contribute to funding of infrastructure improvements.
- Provide additional land that could be used to provide a new secondary school to serve the western part of town.
- Provide additional SANG.
- Provide additional biodiversity and public recreation access benefits,
- Provide additional local centre facilities, including a second primary school if needed.

The University attaches a map at Annex 1 that identifies the additional area (51.5 ha) to comprise the safeguarded land.

The University notes the requirements listed in bullet points associated with Policy A26. These are acknowledged and are being addressed in a masterplan being prepared for the site. Given the continuing evolution of the concept, a draft illustrative master plan has been submitted, in support of the University’s comments in this document. This shows the concept for the draft allocation. See Annex 2 to these comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The University notes the allocation of this 67 ha site as a mixed sustainable development. The University also notes that the site is freestanding in the countryside several miles from the nearest significant urban area and questions whether this is an appropriate location for a new community. It represents a substantial extension to Normandy and Flexford, and its future development would effectively join them up to create a new settlement.

Such a location is unlikely to be sustainable in terms of the ability to be self-sustaining in terms of facilities and employment, given that it is not integrated with an existing large urban area that provides existing employment, services and facilities. It is likely that many residents will have little alternative other than to commute to work and to access many services and facilities, and that much of this commuting will take place by private car rather than walking, cycling and public transport.

In the March 2016 budget, the government announced that garden villages should consist of between 1,500 and 10,000 homes. The prospectus document titled Locally-Led Garden Villages, Towns and Cities, which was published alongside the Budget, reaffirms this view. It is therefore considered that ‘discrete’ settlements should involve a minimum of 1,500 dwellings, which is deemed the required minimum quantum of development in order for a sustainable development to be of a sufficient scale to create the necessary critical mass to function in a sustainable manner.

The University therefore questions the suitability of the Policy A46 site as a strategic development site, unless other better located sites do not come forward in the plan period.

It appears that the site provides little more than an enabling development for a new secondary school, which could be provided on another site. The need for the secondary school itself seems a little uncertain but it is right to consider potential locations in the plan. For example, should there be allocation of a safeguarded site west of land at Blackwell Farm (Policy A26) as proposed elsewhere in the University’s comments then the secondary school could be provided at that location on the safeguarded land.

The site in A46 is highly sensitive green belt according to the GBCS scoring system, a category that has led to other land being removed from the plan. It is therefore highly surprising to see this land proposed for this use when there is other less sensitive land that could be used. This inconsistency in the rationale for site allocations potentially undermines the integrity of the plan.

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

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<td>The University supports this policy that requires high quality design. The University is pursuing a high quality approach to development at Blackwell Farm that chimes well with this draft policy.</td>
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<td>The University supports this policy and welcomes the recognition in the policy that effective sustainable design and construction measures need to be practical and viable.</td>
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The University supports this policy, which sets out a series of criteria applicable to development in urban areas and inset villages that should be taken into account when formulating development proposals.

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

Attached documents:

Comment ID: PSLPP16/17301  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

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

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

The University supports the allocation of between 37,000 and 47,000 sq m of floorspace for B1a and B1b uses and between 4.7 and 5.3 ha land for B1c, B2 and B8 use class floor space to ensure an adequate supply of land is available for employment purposes.

In addition, the University supports the Plan’s view that “The retention of existing and creation of new incubator and move-on units is key to supporting new businesses in the borough and helping existing small businesses to thrive” and also the stated view that “A priority in our economic strategy is to increase the amount of incubator and start-up space for new and emerging SME’s.”

The University of Surrey and Surrey Research Park are important contributors to business innovation and start up and the Blackwell Farm allocation will enable the Surrey Research Park to expand and secure further success.

The University supports recognition of the University of Surrey and Surrey Research Park as significant contributors to the local economy, as outlined in paragraph 4.4.4 as follows:

“Guildford’s economy is strong in areas that the government has announced are high priority growth areas for the UK including health and life sciences, space, digital and creative industries, and professional services. We are seeing the emergence and clustering of innovative industries, some based at the Surrey Research Park and the University of Surrey and others in the town centre, such as electronic gaming, stem cell research and satellite technology. We have also benefited from strong cluster growth in high tech innovative businesses including healthcare and bioscience and satellite technology. There are some emerging clusters built around 5G technologies and veterinary science (including the significant recent investment and presence of the Pirbright Institute, world leaders in animal virology) which have considerable potential for inward investment and business start ups.”

The University supports the protection of the Surrey Research Park (extended) as a Strategic Employment Site.

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

Attached documents:

Comment ID: PSLPP16/17302  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The University notes the sequential approach proposed through Policy E2 in relation to the location of new office and research and development floorspace in the borough. This policy states that:

“Proposals for new office and research and development (use Class B1a and B1b) floorspace will be directed first to Guildford town centre, then sequentially to:

• locations within 500m of a public transport interchange,
• Office and Research & Development Strategic Employment Sites unless the proposed floorspace is limited in scale (less than 200 sq m or 25% of the existing office/R&D floorspace whichever is the lower) and/or ancillary to the primary use of the site OR the proposed floorspace meets the criteria set out in policy E4 and is appropriate to be located on Surrey Research Park.”

The University does not consider that this approach is the most sustainable way of planning for the delivery of future employment space in the borough. The plan is not sound on this issue and this requires a change.

New development, irrespective of the type of development proposed, should be delivered in the most sustainable locations. The University therefore does not consider that all new office and research and development floorspace should necessarily be directed first to Guildford town centre, because there can be no guarantee that this will in fact be the most sustainable location. For example, the plan proposes the creation of new strategic development sites, such as the urban extension at Blackwell Farm, whilst identifying office and research and development strategic employment sites, both of which would not be deemed priority sites for development according to this policy.

It is therefore considered that the sequential approach proposed through Policy E2 should be replaced and new employment floorspace should be directed to the most sustainable locations in the borough. In some circumstances this may be in the town centre, but in other circumstances it may well be in other locations.

The following change to wording is proposed:

“Proposals for new office and research and development (use Class B1a and B1b) floorspace will be directed to the following locations:

• Guildford town centre
• Office and Research & Development Strategic Employment Sites unless the proposed floorspace is limited in scale (less than 200 sq m or 25% of the existing office/R&D floorspace whichever is the lower) and/or ancillary to the primary use of the site OR the proposed floorspace meets the criteria set out in policy E4 and is appropriate to be located on Surrey Research Park.
• Locations within 500m of a public transport interchange

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

Attached documents:
The University fully understands the Council’s concerns over any potential future loss of employment floorspace in the borough and is supportive of the proposed measures set out within this policy to resist the loss of employment floorspace.

However, it is considered important to clarify within the wording of the policy that it is only applicable to proposals that are not captured by permitted development rights that allow the change of use without planning permission, such as offices into residential accommodation, provided an Article 4 direction is not in place. The following amendments to the policy wording are therefore suggested to ensure the policy reflects development that is capable of taking place without the need for planning permission:

“In order to sustain and enhance employment capacity (including land, floorspace and/or jobs), notwithstanding the provisions set out within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or later amendments to the regulations:…”

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

Attached documents:

**Comment ID:** PSLPP16/17304  **Respondent:** 8967233 / University of Surrey (Sir or Madam)  **Agent:** Terence O'Rourke (Luke Vallins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

The University is very pleased to see the value that the Council attributes to the Surrey Research Park, as outlined in its decision to introduce a policy that specifically covers the Research Park.

As explained earlier, the presence of the University and the Surrey Research Park have helped to diversify the region’s economic base by adding technology jobs to the public, retail and service sector employment in the region. The University and its Research Park have mitigated impacts on Guildford with investment in public transport, with onsite accommodation for students and by together putting about £1.7 billion into the UK economy every year. This includes about £950 million in Guildford borough.

The University is supportive of this policy as well as the proposed extension to the Surrey Research Park, which will enable the Research Park to grow and to continue to deliver a range of benefits to the borough.

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

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<td>The University is pleased to see that the Council recognises the contribution that the Surrey Sports Park, along with other sporting facilities, makes to promoting and facilitating active lifestyles amongst the borough’s population.</td>
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<td>Generally, the University supports the town centre vision to protect and build on the assets of Guildford Town centre and supports policy E7, given that the continued prosperity and vitality of the town depends on a thriving town centre.</td>
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<td>However, whilst there are good opportunities for development and redevelopment in the centre, which will bring benefits in terms of new uses, new homes of various types, new employment and retail opportunities, improved services and facilities and improved vitality, the University is concerned that the plan should not result in overdevelopment.</td>
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<td>The University is of the view that overdevelopment of the town centre will increase congestion and degrade the environment and quality of life for residents of the town centre as well as visitors and workers.</td>
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<td>Should new homes displace employment this brings other problems, such as providing services such as schools for the increased number of residents, whilst reducing employment in the town centre and displacing this to other sites, perhaps outside the town and borough.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

The University recognises the role that local centres play in providing a focus for everyday shopping and service needs. The University agrees with the strategy to encourage provision of new homes above ground floor non-residential uses. The University is broadly supportive of paragraph 4.492 of the supporting text to this policy.

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

Attached documents:

Comment ID: PSLPP16/17296  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

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

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

The University welcomes and supports much of the content of this policy, but strongly objects to the specific wording regarding student housing which it regards as being discriminatory. The intention to provide homes for all is welcomed and supported. The University notes that this includes all sectors and age ranges of society, including students. The University also supports the provision of a mix of housing, with a wide choice of homes. It would add that this wide choice should be available to all, including students, who are not a homogeneous group and just as every other segment of society have different needs. The University generally supports the principles set out with respect to density, including making best use of land and variation of density dependent on local context, character and sustainability of the location. However, the University strongly objects to the part of the policy that addresses student housing, specifically the expectation that 60 per cent of the University’s eligible student population (full time equivalent students) should be provided with student bedspaces and accommodation on campus. First of all there is a need for care in the use of terminology in the phrase “eligible student population (full time equivalent)”. The “eligible student population” is not the same as the “full time equivalent” student population. The term “eligible students” is a working definition that the University has previously used in the context of the Local Plan to estimate those students likely to require accommodation in the borough as a direct result of their studies. This therefore excludes students such as part-time students, distance learning students, students on industrial placements, students who commute and students who may be living in the family home. All these students will be included in the full time equivalent number.
In addition, it should be noted that the University already provides and has planning permission for a large number of student residences in Guildford on its sites at Stag Hill, Manor Park and Hazel Farm. There are about 7,100 student bedspaces that are either already built and in use (5,100) or committed through planning permissions (about another 2,000, depending on detailed planning).

The University is making a significant contribution to meeting its student housing needs, with about 48% of full time Guildford-based students currently in University-owned accommodation. Relative to other towns with universities, Guildford is underserved by Purpose Built Student Accommodation not owned or controlled by the University and this is regarded by the University as an area where some collective focus needs to be placed.

The proportion of full time Guildford-based students in University accommodation varies year to year as the student cohort changes, and the supply of accommodation also changes.

It should be noted that the University already provides for more accommodation on its land for its students than do 95% of all other higher education institutions, including small specialist institutions.

Against this very favourable background, it is therefore not clear why the reason is for the proposed wording as part of Policy H1, nor how this element of the policy would be operated in practice. The wording in the policy reads as an aspirational statement (i.e. that a minimum of 60% of eligible students should be provided with accommodation on campus) without any context regarding how this could practically be achieved, assessed or monitored. This aspiration is not a policy, and hence has no place in Policy H1. This aspiration is also discriminatory against the University and against students.

The University recognises that there is a desire to see as many students as possible in purpose built student accommodation rather than in shared houses in the residential areas of the town. Nevertheless, it is important to take into account that University students have the same rights as any other member of the public and the University cannot compel them to live in its accommodation. Similarly, the University cannot reasonably be expected to build on campus accommodation beyond the actual demand from its students. The University believes and evidence suggests that the real demand for on campus accommodation lies between 50% and 55% of full time Guildford-based students.

Whilst the University itself seeks to provide accommodation for between 50 and 60% of its full time Guildford-based students this is not considered to be a binding target and the exact figure will go up and down depending on fluctuations in the number and type of these students and the number of available rooms year on year.

Indeed the University considers that there is a point around 55% of the full time Guildford based student number at which on campus accommodation might suffer increased vacancy rates with very severe implications for the financial sustainability of the University. This is because living in shared houses in established residential areas will always be attractive to a large part of the student body irrespective of the number of rooms available on campus. Over-provision of rooms on campus to the extent that vacancy rates in the University’ s accommodation rise is inefficient use of land and investment, and should be avoided.

The University notes that there are also other ways in which purpose built student accommodation can be provided, other than directly by the University on its campus, or by the private rental sector in shared houses.

There are opportunities for independent student housing providers to provide purpose built accommodation for students in locations away from the campus, such as the town centre. This in turn provides another and different type of accommodation, with the advantages of bespoke student accommodation but away from campus and close to town centre facilities and amenities. This is a very small part of the Guildford context at the moment, but should increasingly become a factor in the future.

The University notes that the Council has granted permission for such development in the town centre. In the context of the night time economy and introducing vitality to the town centre, there is a case for more such accommodation as part of the development mix in the town centre. This also attracts students away from more traditional suburban residential neighbourhoods with family housing. This is what happens in many other university towns and cities in the UK.

The University also suggests that it would be inconsistent to place such a requirement on the University and not on other higher education providers in the borough, none of whom currently provide accommodation for their students.
Taking all of the above into account, the University suggests that the H1 policy text under the heading “Students” be deleted and replaced with:

“The provision of new purpose built student accommodation is encouraged and should be located on, or close to, the University Campus or sites of other higher education institutions, or in the Town Centre.”

This approach ensures that the policy makes provision for student accommodation, does not discriminate according to where the students are studying, encourages developers of purpose built accommodation to consider sites in sustainable locations with good accessibility to the University, and encourages the introduction of students living in the town centre where their presence can help to boost the vitality of the centre. The result would be less pressure on areas of more traditional family housing.

**Paragraph 4.2.17**

This paragraph sets out some of the housing issues in relation to students. The University considers that it would be appropriate to add the following to the start of the paragraph:

“The continuing growth of the University in particular is important to the prosperity of the borough and the local plan should include provision for future student housing needs.”

**Paragraph 4.2.18**

The first sentence of this paragraph states that:

“To minimise the pressure on the existing housing stock it is important that any significant increase in full time student numbers is matched by the provision of purpose built student accommodation.”

The University agrees that as more students arrive there should be more purpose built student accommodation and that the local plan should make provision for this. The change suggested to Policy H1 would assist in this by making it clear that the provision of purpose built student accommodation is supported in locations on the campus, close to it and in the town centre.

The University considers that 60% of the growth in the full time student population (i.e. not the total, but additional students arriving from the base date of the local plan) is a more realistic target than that in Policy H1 (which the university has suggested should be removed and replaced with the more positive text it has proposed above).

Hence it would be appropriate to have the following inserted at the end of the text of paragraph 4.2.18:

“We expect 60% of the growth, from 2015/16 onwards, in the University of Surrey full-time Guildford-based student population to be provided with purpose built student accommodation. This may be located on or off campus.”

This has the effect of removing the expectation of a target amount from the policy text, where it has no place, and into explanatory text, where it is more appropriate, whilst also setting a more realistic expectation with regard to growth in numbers.

The following might also usefully be added to paragraph 4.2.18 as further context:

“The University of Surrey has outline planning permission for increases in academic floorspace and student accommodation that it expects to build within the plan period. It does not anticipate at this stage any further significant space needs in the plan period beyond those for which it already has outline planning permission.”

This would make it clear that the University’s needs are provided for already by the outline permission granted for Manor Park in 2004, and still extant.

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

**Attached documents:**
The University broadly supports the policy on provision of affordable homes. However, the University is concerned by the deletion of the text at the start of the second paragraph that the provision of affordable housing is subject to viability. The University considers that it is important that this test is explicit in the wording of the policy given the importance of viability in development decisions, in addition to its consideration in the supporting text to the policy (paragraphs 4.2.38 – 4.2.44).

The University considers that the policy, as drafted, is therefore not consistent with national policy. For example, paragraph 173 of the NPPF explains that “To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The University therefore considers it necessary for viability considerations to be reintroduced into this policy as follows:

“Subject to viability, these affordable homes will be provided:…”

The University considers that the requirement for 40% affordable housing provision is set at a more appropriate level when compared with the requirement of 45% for greenfield developments as set out in the draft plan, and is likely to be more reflective of viability.

The University notes that the policy requires affordable homes to be provided on site of 0.17 ha or more. The University does not consider purpose built student accommodation schemes are suitable to attract an affordable housing requirement and considers it important for this to be clarified in the local plan.

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

Attached documents:
The University broadly supports this policy. The University recognises the importance of delivering new infrastructure to support major new development in the borough, the need to make best use of existing infrastructure, and the potential opportunities for improvement of this infrastructure.

The University notes the infrastructure requirements identified in relation to Blackwell Farm in Appendix C.

The introduction of CIL is noted and supported provided this sets appropriate chargeable rates taking account of viability and the extent to which new infrastructure is provided by the developer as an integral part of the scheme proposals.

Further comments are made in relation to policy I2 below.

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

Attached documents:

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**Comment ID:** PSLPP16/17312  **Respondent:** 8967233 / University of Surrey (Sir or Madam)  **Agent:** Terence O'Rourke (Luke Vallins)

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

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

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

The University agrees that there should be improvements to the A3 and M25 to enhance access into Guildford and reduce congestion levels. It is therefore encouraging that improvements are included within the Department for Transport’s Road Investment Strategy, as outlined in Policy I2 and the University would welcome improvements provided they are effective and are delivered in a timely manner.

However, the University is concerned with the view that the delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford, and considers that this has not yet been robustly demonstrated.

The Strategic Highway Assessment (SHA) Report (SCC, June 2016) comes to this conclusion, but recognises that its approach represents a “worst case” in terms of highway demand that has not taken into account any reduction in trips generated because of the mixed use nature of large developments or proposed investment in sustainable transport modes and other mitigation measures. Detailed comments in relation to the SHA are provided separately.

The Local Plan should reflect the fact that highway infrastructure requirements set out are based on a ‘worst case’ assessment of highway impacts and that there must be flexibility in delivery. This should be reflected in the Local Plan Vision and in Policy I1 and Appendix C.

Nevertheless, the University recognises that further, more detailed assessment work will be required ahead of examination, such as identifying at what point widening of the A3 is triggered and what development can come forward ahead of this. In this regard, it will endeavour to provide technical assistance to GBC, SCC and Highways England wherever possible.

The University is aware of the proposed improvements to the A3 and M25 and has factored these into its future development proposals given the proximity of the University and Blackwell Farm (Policy A26) to the A3.

However, the University would be concerned if the need for these improvements and the programme for their delivery placed onerous constraints on its own development on its campus, or that of the Blackwell Farm site.
The plan should acknowledge that there are circumstances in which sustainable development of some elements of important strategic sites may come forward in advance of projects in the RIS.

In particular at Blackwell Farm (Policy A26) there is potential for development to come forward that can take some pressure off the A3 by providing an access into and out of the Surrey Research Park, the Royal Surrey County Hospital and the University via the new access on the A31. The residential development at this location is also on the Sustainable Movement Corridor with good links to the town centre by public transport, walking and cycling.

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

Attached documents:

Comment ID: PSLPP16/17313  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

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

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

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

The University generally supports this policy, particularly the following text regarding the proposed Sustainable Movement Corridor and the intention for it to serve key parts of the borough, including the new communities at Blackwell Farm and the University campus.

The University considers that an urban extension at Blackwell Farm (Policy A26) will promote more sustainable travel patterns in line with this policy. This would be achieved by maximising accessibility through the masterplan and detailed design measures and then making appropriate contributions to support other sustainable transport measures to mitigate impact and provide greater travel choice.

In particular, the masterplan for Blackwell Farm will provide a permeable layout with high quality, safe and direct routes to encourage walking and cycling trips not only within the site but to the adjacent employment, services and facilities in the western part of Guildford. In this respect, and by making provision for the extension of existing bus services through the site, it will make the most of the opportunity presented by the site’s location at the end of the proposed sustainable movement corridor in the town.

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

Attached documents:

Comment ID: PSLPP16/17314  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
The University broadly supports this policy and would highlight the opportunities at Blackwell Farm (Policy A26) for the creation of a network of high quality, flexible and useable green spaces as part of the masterplan, retaining and making best use of existing green assets such as woodland areas and incorporating measures intended to enhance biodiversity.

These features will provide opportunities for play, leisure and relaxation through the provision of on-site SANG. Opportunities also exist to provide blue infrastructure networks through the provision of small-scale bodies of water as part of the drainage strategy.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17298</th>
<th>Respondent: 8967233 / University of Surrey (Sir or Madam)</th>
<th>Agent: Terence O'Rourke (Luke Vallins)</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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</table>

The University broadly supports this policy. The University notes that the allocation in Policy A26 at land at Blackwell Farm for a mixed use urban extension includes a small area of land that is located within the AONB.

The University confirms that its proposals for this land do not include new buildings within the AONB boundary, although the proposed new site access from the A31 (which is itself already within the AONB) will inevitably pass through the AONB. This is included within the site allocation at Policy A26. The University will ensure, working with the planning and highway authorities, that this access will be created sensitively in line with the policy.

The University notes that the policy also covers the Area of Great Landscape Value (AGLV), and that the land allocated for development at Blackwell Farm under Policy A26 includes a small area of land currently designated as AGLV. It is also noted that policy P1 states in the 4th paragraph that the AGLV will be retained until such time as there has been a review of the AONB boundary.

Whilst it is accepted that the AONB boundary, as a national designation enshrined in law, can only be changed following the procedures set out in the relevant legislation, the AGLV is a local designation that can be changed by the local planning authority through the plan process. We also understand that the part of the AGLV that is within the A26 site allocation is not included in the proposed ‘candidate areas’ submitted to Natural England for consideration under the AONB boundary variation process.

Hence the AGLV designation should be removed from the allocated land and this should be reflected on the Policies map.
It is unlikely that the outcome of the AONB boundary review would seek to extend the AONB boundary onto land allocated for development in a local plan or draft local plan, and it is not certain that the AONB review will actually be completed.

The University considers that the local plan should include safeguarded land where the green belt boundary has been altered to provide flexibility for longer term development needs and to prevent the need to revisit the green belt boundary again in a future local plan review. It has put forward additional land in its ownership at Blackwell Farm, adjacent to land allocated in Policy A26, that is suitable, available and deliverable to help provide for the borough’s future development needs and that should be identified as safeguarded land. The University notes that this additional land is outside the AONB but parts of it lie within the currently identified AGLV. Again, the AGLV should be removed from this safeguarded land and this should be reflected in an update to the Policies map.

**Paragraphs 4.3.7 – 4.3.8**

As noted in connection with Policy P1, the University sees no reason why the AGLV cannot be removed in advance of the AONB boundary review, and considers that an updated Policies map should be produced to reflect this.

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

**Attached documents:**

Comment ID: PSLPP16/17299  **Respondent:** 8967233 / University of Surrey (Sir or Madam)  **Agent:** Terence O'Rourke (Luke Vallins)

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

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

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

The University broadly supports the policy and notes that the Green Belt boundaries can be viewed on the “Proposals map”, although this should be clarified as being visible on the “Policies map”.

The Policies map confirms that Blackwell Farm is a site allocation, through Policy A26, that falls within the Urban Area outside of the Green Belt.

The University makes comments on the other allocated sites as appropriate in its responses to the relevant policies of the plan.

The University agrees that there are exceptional circumstances to alter the green belt boundary to provide for development needs and promote sustainable patterns of development. However, it considers that paragraphs 4.3.16 – 4.3.17, which provide background to Policy P2 regarding the green belt, should provide more details about the exceptional circumstances to alter the green belt boundary to bring more land into the green belt area in the vicinity of Ash and Tongham.

**Exceptional circumstances**

The University agrees with the statement in paragraph 4.3.16 regarding exceptional circumstances to justify the alteration of green belt boundaries in the local plan.
At a plan-wide level there is a combination of factors, including a particularly high level of housing need exacerbated by a significant backlog of unmet need and the lack of suitable alternative land, that together comprise exceptional circumstances. The University considers that these factors exist in Guildford and the extent of these circumstances is clearly well beyond the ordinary.

In this context the University firmly believes that the allocation of land at Blackwell Farm fits well with the exceptional circumstances. It is large enough to provide a significant number of new homes and associated services and facilities, as well as to fund new infrastructure and improvements to existing infrastructure that will benefit the town.

In particular it lies adjacent to the existing large cluster of employment, services and facilities on the western side of the town leading to a strong likelihood that sustainable modes of travel will be used by new residents to access the existing employment opportunities, services and facilities as well as those to be provided on site.

The Blackwell Farm site is integrated with the western end of the town’s proposed sustainable movement corridor which further emphasises the ability of the site to provide new residents with realistic opportunities to walk, cycle or use public transport to go about their daily lives.

The successful Surrey Research Park is a major asset to Guildford’s economy but is now almost full as the last available development plots are either reserved or an option for expansion of satellite technology or are being developed. Policy A26 provides potential for an extension to the Park to build on its economic success, which has been and continues to be an important element of the growth and prosperity that Guildford enjoys and will continue to enjoy with this extension. The ability to extend the Park is an important factor in support of the allocation of Blackwell Farm.

In addition, the University itself is a major asset to the town and borough, not just educationally and economically but also through the cultural, sporting and social opportunities and facilities it provides. Given that Blackwell Farm is owned outright by the University, there is an opportunity to generate returns for the University in a constrained funding environment, which will allow the University to reinvest receipts in maintaining, renewing and adding to its facilities including academic buildings, residences and mixed use service facilities on campus as well as support scholarship involved in research, teaching and innovation and hence in the town.

The University’s sole ownership of the site is also an advantage in bringing the site forward for delivery of homes. This sole ownership provides greater confidence of delivery. The University is also a world class Guildford institution, rooted in the town and the borough, with a significant stake in the future of Guildford.

The University intends to retain control over the development and the land, providing long term stewardship, and acting as a trusted custodian of the land and the homes it will deliver, to control quality and future management of the site.

The University considers that the need to extend the Metropolitan Green Belt to prevent Ash Green coalescing with Ash and Tongham seems rather less than exceptional. The plan should explain further why there are deemed to be exceptional circumstances to justify this extension.

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

Attached documents:
The University accepts the purpose of this policy, which looks to ensure the long term protection of the Thames Basin Heaths Special Protection Area (SPA). The University provides further comments specifically in relation to the allocation at Blackwell Farm (Policy A26).

**Paragraph 4.3.51**

Of particular relevance to the University with regard to potential impacts on the integrity of the Thames Basin Heath SPA, paragraph 4.3.51 includes student accommodation within the definition of residential development.

The University does not dispute that student accommodation may have some impact on the SPA, but this impact is not in the least bit comparable to the impact of other types of residential accommodation, such as standard dwellings. For example:

- University policy precludes students from bringing cars onto any of its campuses and the University operates a robust parking management system that ensures that unauthorised parking is strictly controlled.
- The occupancy conditions of University accommodation preclude students from keeping any type of pets on campus. It is made very clear in University policy to all students with on-campus accommodation that pets are not permitted. In the unlikely event that a student did bring a pet into the accommodation the University would robustly enforce this restriction.
- The majority of students are likely to participate in recreational activities that are located either at the Manor Park or Stag Hill campuses, in Guildford town centre, or the immediate local area. This is partly because of reduced mobility arising from restrictions on car parking but also because the University has extensive outdoor sport and recreational facilities available on the Manor Park campus that are easily accessible to the existing and new student residences.
- All students benefit from the first class sporting facilities provided by the Surrey Sports Park, that include a range of outdoor playing fields. In addition, there are informal amenity spaces available across both campuses that provide other alternative recreational resources. Across Stag Hill and Manor Park campuses there are some 11 ha of informal open space, grassland and ponds and around 11.5 ha of sports pitches, within open space and accessible for students to walk around.
- Whilst the University accepts that theoretically some students could visit the SPA by a combination of cycle and/or public transport, in practical terms given the restrictions on student car use, the distance between the University and the SPA, and the easy access to alternative recreational resources on-campus (or in the immediate vicinity) the actual likelihood of students visiting the SPA in any significant numbers is considered to be very small.

The above therefore clearly shows that students and student accommodation are unlikely to impact on the SPA to the same or a similar extent as other types of residential accommodation. This is therefore a consideration that will need to be taken into account when considering any future planning applications for the development of student accommodation in Guildford, as has been the case in the University’s recent applications.

As part of the allocation at Blackwell Farm (Policy A26), the University proposes the delivery of bespoke SANG to mitigate the impacts of the development on the SPA.

**Paragraph 4.3.54**

With regard to potential impacts of development on the SPA, paragraph 4.3.54 explains that “Proposals for student accommodation may not need to provide mitigation and avoidance measures. This will be assessed on a case by case basis.”

The University is supportive of this text as it takes account of the points mentioned above and reflects the different impacts associated with student accommodation when compared with other residential development. This is the approach that has been taken in relation to the University’s recent applications for student accommodation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The University supports the clear presumption in favour of sustainable development in line with guidance in the National Planning Policy Framework (NPPF).

Part of the accepted view of sustainable development is that it provides a better living environment; it also has a strong economic component that provides employment; and it helps create social cohesion.

The economic component of this in an increasingly competitive global economy is critical in achieving this form of development, alongside the environmental and social goals.

There is widespread acceptance and clear evidence that universities play a major role in supporting innovation and competitiveness in the UK. In addition to delivering outstanding research and teaching, universities interact with all the stakeholders in the economy and there is evidence that demonstrates the positive contribution that they make to the UK’s economic and social development. In the case of the University the leverage it brings to the UK economy in Gross Value Added terms is seven times its income each year. This is particularly high for the sector and supports the vitality of Guildford and the region.

Based on this evidence, what has been described as a triple helix model of economic development has now become widely adopted. This model involves collaboration between businesses, government and universities but also requires some crossover of their roles, with universities taking a more commercial role in developing ideas, government facilitating with funding and business committing more resources to research and development.

Much of government policy since 1997 at a national and European level has focused on this three way relationship. Under the regime of Regional Development Agencies (RDAs) universities in the UK were required to extend their role from teaching and research to include community development. This was funded through a number of initiatives, of which some remain in place. This relationship remains as a key driver and was set out in the government report “No Stone Unturned” and is also influencing the funding activities of the Local Enterprise Partnerships (LEPs). The former government also established its own National Innovation Agency (Technology Strategy Board) and at a European level the Horizon 2020 programme again reflects the importance of innovation.

What has also been recognised since the early part of the 21st Century is the need to accelerate the process of innovation through what has become known as open innovation or co-creation, which relies on talent and skills and has resulted in a focus on the role of creative young people.

The University of Surrey has been and continues to be closely involved in all aspects of these policy-led models of innovation, and today is responding to the challenge of supporting the open innovation model.
To continue to be effective as a stakeholder in the relationship with government and business in order to support the open innovation model, the University has recognised the need to be able to attract to and retain in Guildford the necessary people with the necessary skills and talent to support its evolving role.

The plans for the development of Blackwell Farm include provision of employment land near to the economic drivers of the University of Surrey, the Surrey Research Park and the Royal Surrey County Hospital. They will also locate new homes close to existing and proposed employment, providing the opportunity for workers to live closer to their place of work.

Despite the high gross value added of Universities (Surrey provides £6.90 of GVA to the UK for every £1 income it receives), the economic fundamentals are difficult. In order to maintain their estates and to generate cash for reinvestment a typical University would need, in the current funding regime, to generate surpluses of around 5% to 7% per annum. Few research-intensive science based Universities do this, and Surrey is no exception.

The plans for Blackwell Farm will provide the University with resources for re-investment in its activities in Guildford, helping to cement its position and secure its future. This in turn will benefit the town and the borough.

**Paragraph 4.1.6**

The University supports the stated preference to focus development in the most sustainable locations and to make the best use of previously developed land. However, whilst the use of previously developed land in the main urban areas is supported, the University would note that all previously developed land in the borough is not necessarily in the most sustainable locations. A change to the text is therefore suggested as detailed below.

It is important to protect the environment within our urban areas from over development that could affect quality of life and that could adversely affect the attractiveness and amenity of the urban environment.

Development that is on sites that are remote from the main urban areas, even if it uses previously developed land, is often less sustainable than greenfield locations on the edge of town and close to existing services and facilities. This is because development in locations that are relatively remote from the main employment and service centres at the main urban areas provides little alternative other than the use of the private car to gain access to jobs, schools and other services.

Depending on the specific circumstances and context, development in such relatively remote locations is therefore often less sustainable than similar development on greenfield sites on the edge of the main urban areas, since these often have a far greater ability to provide good alternatives to use of the private car.

Taking into account the imperative for residents at relatively remote sites to use private cars rather than having the opportunity to walk, cycle or use public transport, there are implications in terms of use of resources, carbon balance and related environmental and social impacts that have to be considered. These include increased congestion on roads, increased vehicle emissions, the time spent and cost of commuting, and the effect this can have on household budgets and on general health and well being.

There is therefore a question mark around the idea that inset villages and other identified villages are of equivalent status as sustainable locations to Guildford urban area, even if there is previously developed land that has potential to be used for new homes.

There will of course be circumstances where some limited amount of development in the villages in the borough may be necessary to sustain existing services and facilities that may be at the margins of viability, and in some cases there may be viable public transport options for travel. In these circumstances previously developed sites should of course be used where suitable and available. It is also apparent that smaller sites are needed as well as larger ones to keep a supply of homes coming forward.

Nevertheless the list of sustainable locations in the paragraph should include urban extensions to Guildford.

This is because the town of Guildford is by far the largest settlement in the borough, where the majority of people live. It is the economic powerhouse of the borough, and indeed a wider area beyond the borough boundaries. It is the focus for employment, services, retail and other facilities for a wide catchment. Extension of the town’s boundaries to allow more
new homes and employment land to integrate with the existing town is a more sustainable approach than pushing new homes to locations away from the town, even if these may be previously developed sites.

Paragraph 4.1.6 should be reworded to read:

“Our preference is to focus growth in the most sustainable locations, including both making the best use of previously developed land and land that is well located in relation to existing services and facilities. These locations are:

- Guildford town centre
- Urban areas
- Urban extensions
- Inset villages
- Identified green belt villages.”

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

Attached documents:
boundaries, has looked to the longer term beyond the plan period. Given the tightness of the green belt boundary in the borough it is therefore not clear how the Council now intends to accommodate any additional housing pressure over and above what it is currently planning for, if the need arises.

Without safeguarded land there is no safety buffer should housing needs develop further, which is not a sustainable way of planning for the future of the borough.

Without the provision of safeguarded land, it is possible that there will be pressure to undertake further alterations to the green belt boundary later on in the plan period, or in a future period beyond that, whereas the matter can be suitably dealt with now in anticipation of any potential further housing needs.

The University therefore considers that the borough-wide strategy set out in Policy S2 should include safeguarded land, altering the green belt boundary in this plan to allow space for future development needs.

Such land should be well located in relation to the urban area. Land at Blackwell Farm allocated for an urban extension under Policy A26 is particularly well located in relation to the employment areas to the west of the town, and will see further employment creation as a significant part of the borough’s planned employment land is located there. It will have a new access on the A31 that will help to ease pressure on the A3. It is located on the western end of the Sustainable Movement Corridor that links it to Guildford Town Centre.

There is land immediately adjacent to the west of the land allocated in Policy A26 at Blackwell Farm that is available and is suitable for inclusion as safeguarded land. This land is well placed in relation to the new A31 access and employment land, and the new sustainable transport links could easily be extended into this area. The area is shown on the plan at Annex 1 to these comments.

The University considers that the land should be identified as safeguarded land and the green belt boundary should be altered accordingly.

The following should be added to Policy S2:

“Areas identified as safeguarded land will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. All proposals must not prejudice the possibility of long term development on safeguarded land sites. The status of safeguarded land sites will only change through a review of the local plan.”

There should also be a new section of explanatory text as follows:

“The identification of safeguarded land ensures that green belt boundaries will last beyond the end of the local plan period. This is in accordance with national planning policy which states the intention for green belt boundaries to have permanence in the long term.

The green belt boundary will be altered to exclude the safeguarded land. Consideration of the permanent development of safeguarded land, such as for housing or employment, will only occur through a change to the allocation through a review of the local plan. During a local plan review, the reassessment of safeguarded land will involve determining for each site whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as safeguarded land until the next review of the plan.”

The plan should go on to identify the safeguarded land as a new site allocation policy (or policies) accordingly.

**Paragraph 4.1.8**

The University supports the recognition in this paragraph that not all development can be located within the identified sustainable locations.

The University therefore broadly supports the proposal to release allocated land in other areas, and notes the list provided, which includes urban extensions.
However, the University considers that urban extensions to Guildford, as the principal town in the borough, provide some of the most sustainable locations. The University has suggested a change to paragraph 4.1.6 to reflect this, and suggests an additional change to paragraph 4.1.8 as outlined below.

Hence the University suggests that the bullet points in paragraph 4.1.8 be redrafted as follows (and in the context of the University’s proposed change to paragraph 4.1.6 to include urban extensions as some of the most sustainable locations):

- Countryside beyond the green belt
- New settlement at the former Wisley airfield
- Development around villages (including some expansion).

Table 1 – Planning Delivery between 2018 and 2023

The University welcomes the inclusion of land at Blackwell Farm in the list of urban extensions to Guildford.

The University notes that the Blackwell Farm site is allocated in Policy A26, and has provided further responses to that specific policy, and to other site specific policies as necessary.

Table 2 – Hierarchy of retail and service centres

The University notes and is supportive of the inclusion in table 2 of Blackwell Farm as a future location for a new urban local centre as part of the mixed-use strategic development.

A new local centre is an important part of the proposals for Blackwell Farm and indeed Policy A26 highlights the elements that it would be expected to accommodate.

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

Attached documents:

- 160718 156110 GBC Local Plan reps final version_reduced.pdf (3.2 MB)
- Annex 1 Current site A26 boundary and proposed safeguarded land.png (783 KB)

Comment ID: SQLP16/1929  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

In order to represent the University of Surrey as it is a major stakeholder in the borough.

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

Attached documents:

Comment ID: PSLP16/17293  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Luke Vallins)
Our vision and ambition, paragraph 3.2

The University broadly supports the Spatial Vision as set out in the box in paragraph 3.2, but has the following comments on specific aspects.

Paragraph 4 of the box

Paragraph 4 of this box refers to the plan making provision for the following development:

- Just under 4,000 units on two urban extensions at Gosden Hill Farm and Blackwell Farm.
- A new settlement at Wisley containing over 2,000 homes
- Significant expansion at Normandy and Flexford to provide over 1,000 homes
- Further development in and around Ash and Tongham

Detailed comments on these allocations are provided in response to the relevant policies later in these representations. Whilst the University broadly supports the provision of large strategic greenfield sites as an essential part of the development strategy Blackwell Farm in particular is strongly supported. It is well placed to provide for a significant element of the borough’s needs, being located next to the significant employment areas located in the western part of Guildford town (including the Surrey Research Park, the Royal Surrey County Hospital, and the University of Surrey). However, the proposed ‘new settlement’ at Wisley and the extension to Normandy and Flexford in particular are less well placed, being relatively remote from existing urban areas.

Paragraph 6 of the box

The University is supportive of the message set out in paragraph 6 of this box, which explains that existing commercial premises will be protected and that additional sites and premises will be provided to meet the needs of businesses across the borough.

The box also explains that the primary new site proposed to meet the needs of businesses across the borough is an extension of the Surrey Research Park. The University is pleased to see that the borough recognises the importance of the Surrey Research Park, and fully supports its extension to cater for the growing needs of businesses for employment space in the borough.

The University considers it has a major role to play in assisting the achievement of the Council’s Spatial Vision, both in its position as a centre of academic excellence and research and development and its links with the Surrey Research Park, the Royal Surrey Hospitals Trust and the Pirbright Institute, and as the custodian and developer of a strategic development site delivering a high quality mixed use and inclusive community at Blackwell Farm.

Specifically:

- The University’s development, whether on its campus or at the strategic development site allocation (Policy A26) at Blackwell Farm, will ensure that supporting infrastructure needs are included. The University has a strong track record in providing infrastructure to support its activities, including funding improvements on the local road network (junction improvements) and sustainable movement (cycle ways and bus services)
- The University is a world class higher education and research institution and its activities have led to the establishment and growth of several world class businesses in Guildford
• Through the allocation of its land at Blackwell Farm as a strategic development site, and the future growth of the Surrey Research Park, the local plan will assist the University in cementing its position and securing its future in Guildford
• The University has provided many buildings of excellent design on its campus, and is planning a new community at Blackwell Farm that will be guided by a strong design code to ensure quality
• The University’s proposals at Blackwell Farm will provide a range of new homes to support the Council’s ambition to have new homes to meet a range of needs
• The University has heavily subsidised public transport to create a frequent and reliable bus service linking the Surrey Research Park and the University campus to the town centre and beyond. The University has also invested in providing new and improved cycling and pedestrian routes in the western part of town Proposals for a new community at Blackwell Farm will link into this existing favourable framework
• The University’s contribution to the life and culture of the town is significant through its wide range of activities and facilities, including sports and arts facilities that enrich the wider community of Guildford
• The University’s proposals for Blackwell Farm will respect the natural, built and heritage environment

Paragraph 12 of the box

• The University agrees that there should be improvements to the A3 and M25 to enhance access into Guildford and reduce congestion levels. It is therefore encouraging that improvements are included within the Department for Transport’s Road Investment Strategy, and the University welcomes such improvements provided they are effective and are delivered in a timely manner.
• However, the University is concerned about the view that the delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford, and considers that this has not yet been robustly demonstrated.
• The Strategic Highway Assessment (SHA) Report (SCC, June 2016) comes to this conclusion, but recognises that its approach represents a “worst case” in terms of highway demand that has not taken into account any reduction in trips generated because of the mixed use nature of large developments or proposed investment in sustainable transport modes and other mitigation measures. Detailed comments in relation to the SHA are provided separately.
• The Local Plan should reflect the fact that highway infrastructure requirements set out are based on a ‘worst case’ assessment of highway impacts and that there must be flexibility in delivery. This should be reflected in the Local Plan Vision and in Policy 11 and Appendix C.
• Nevertheless, the University recognises that further, more detailed assessment work will be required ahead of examination, such as identifying at what point widening of the A3 is triggered and what development can come forward ahead of this. In this regard, it will endeavour to provide technical assistance to GBC, SCC and Highways England wherever possible.
• The University considers that some of the housing at Blackwell Farm can and should come forward in advance of the improvement to the A3 through Guildford, given its position on the network. This will be particularly important if funding arrangements for the A3 improvements are delayed for any reason.
• The proposed new access from the A31 to serve the site will also provide an alternative means of access to and from existing employment areas at the Surrey Research Park, Royal Surrey County Hospital and the University of Surrey, taking some traffic away from the A3. Therefore provision of the access from the A31 through Blackwell Farm to the Surrey Research Park might be an early project to assist the A3, and a proportion of development at Blackwell Farm should come along with this.

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

Attached documents:

Comment ID: pslp172/2452  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A16
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

POLICY A16: Land between Gill Avenue and Rosalind Franklin Close, Guildford

The University supports the addition of ‘sui generis’ to the use class for student accommodation, and the reference to the sustainable movement corridor SPD. We would add that key worker homes for the hospital would also be appropriate as part of the mix at this site and this could be referred to in the policy.

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

Attached documents:

Comment ID: pslp172/2453  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A17

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

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

POLICY A17: Land south of RSCH

The University supports the reference to the sustainable movement corridor SPD in this policy. Given its sustainable location key worker homes and student housing as part of the mix of ‘hospital related development’ would be appropriate and could be referred to in the policy.

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

Attached documents:

Comment ID: pslp172/2484  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A26: Blackwell Farm, Hogs Back, Guildford

Allocation

1): The University notes the change to the text to refer to a minimum of 1500 homes being delivered in the plan period. We understand that this is not a constraint as it does not prevent the whole 1800 homes from coming forward in the plan period if the market and infrastructure provision allows. The University suggests this additional wording to clarify this:

“The total of 1800 homes may come forward in the plan period if the market and infrastructure provision allows”.

The University considers that there is potential for delivery to start from 2020 onwards. A revised illustrative masterplan is attached to these comments to show how the site might be developed.

3): The University supports the change from 31,000 to 30,000 sq m of employment provision. This is shown on the illustrative masterplan framework provided.

4): The University supports the change from 550 to 500 sq m of comparison retail, to be located in the local centre shown on the illustrative masterplan.

9): The University supports the addition of secondary school (6 forms of entry) of which 2 forms are needed for the site, the rest for the wider area. An indicative location for the secondary school buildings is included on the illustrative masterplan framework.

Requirements; infrastructure

1. & 2): The University supports the removal of references to ‘primary’ and ‘secondary’ access (so no access has primacy). The two access points and indicative routes into the site are shown on the illustrative framework masterplan submitted with these comments.

The University notes that the allocation boundary provides a narrow corridor for the access from the A31 but considers that at this stage this should be less definitive given that the detailed plans for the access have yet to be drawn up. The plan should provide for flexibility in the alignment of the access road and the new junction. The plan should show a broad zone through which the access will pass, subject to detailed design.

3): The University notes the addition of reference to the through vehicular access ‘which will be controlled’ for employees and emergency services. The University is content in principle to see a controlled access, but thought needs to be given to the nature of the controls being sought, and the mechanism. Without this the policy may not be effective. The proposed controlled through route is included on the illustrative masterplan framework accompanying these comments and is shown on the access and movement plan showing the key routes through the site.

The University notes the addition of a reference to a choice of vehicular access for new residents/occupiers. This needs to be considered in association with the ‘controlled’ access above.

The University notes that the through link is no longer to ‘provide relief’ on the A31/A3 junction, it is instead to ‘reduce impact’ on it. This change is supported and its benefit is acknowledged.

4): The University notes the reference inserted to a Sustainable Movement Corridor SPD, and that this document does not yet exist. The University looks forward to reading and commenting on a consultation draft of this SPD. The University supports the principle of this investment proposal.

5): The University notes the addition of text to require a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre. The University already provides/subsidises a number of bus services in connection with its campus, and this will be extended in an appropriate manner to the Blackwell site, in discussion with the bus operator and SCC/GBC. However, the words ‘significant bus network’ and encompassing
‘existing western suburbs’ seem to imply something far wider. The University therefore suggests that the wording be changed to say:

“extension of existing bus services to serve the site and to link it to key destinations and the town centre”.

The University considers that the key destinations include the Surrey Research Park, the Royal Surrey County Hospital, the University (including Manor Park, the Surrey Sports Park and Stag Hill), Guildford railway station, and the town centre.

6): The University supports the new text that seeks to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford. The revised illustrative masterplan (submitted with these comments) includes permeability proposals, comprising links between the site and the urban area as well as to the wider countryside.

10): The University supports the new text that adds a community building and playgrounds to list of supporting infrastructure. The revised illustrative masterplan (submitted with these comments) includes this provision.

The University supports the deletion of playing fields from the list of other supporting infrastructure to be provided on site, as this helps to make the best use of the allocated land for new homes. The revised illustrative masterplan (submitted with these comments) includes playing field provision off site adjacent to the development.

11): The University notes that secondary educational need will be re-assessed at the time a planning application is determined at which time any recent new secondary school provision will be taken into account. The secondary school will, however, be no larger than six forms of entry, as referenced in point 9 of the allocation part of policy A26. This should be reflected in the text of this part of the policy, by addition of the words ‘The size of the school at this site will not exceed six forms of entry’.

The University supports that the associated ‘off site’ school playing fields must be dual use and secured through planning application. The attached illustrative masterplan shows the school playing fields off site adjacent to the development.

Requirements; other issues

22): The University supports the deletion of text that splits the employment floorspace over 2 parts of the site. The illustrative masterplan provides for this in one part of the site as an extension to the adjacent Surrey Research Park.

The University supports in principle the new text that states that both the existing Surrey Research Park and the new extension will be together treated as an Office and Research & Development Strategic Employment Site. However, it would seem unnecessary to include this in the policy text, which is already lengthy. Surrey Research Park (extended) is already in the list in policy E1, so this repetition in A26 is duplication and could be removed.

Opportunities

The three opportunities listed in this part of the policy do exist, and the University agrees with the principle of them. However it would seem unnecessary to include them in the policy text, which is already lengthy, given that some of these points are already covered in effect by policy D4 and elsewhere (including other parts of this policy A26 regarding links to the town).

Description

This section appears as supporting text to Policy A26 (it is not in the blue box). It adds ancient woodland, Policy E4 and potential air quality issues to the list of ‘key considerations’, and the University agrees that these are considerations to be addressed in bringing forward the new development required by Policy A26.

The illustrative masterplan framework takes account of ancient woodland, providing a 15metre buffer alongside it. The through road link to the existing Surrey Research Park, to enable access Egerton Road via Gill Avenue, will be designed to minimise potential impacts on the ancient woodland. The ancient woodland will be used to provide Suitable Accessible
Natural Greenspace, and the provision and management of this is compatible with, and will take account of, the ancient woodland characteristics of the woodland.

Policy E4 is provided for by making provision for the Surrey Research Park extension.

A full assessment of air quality issues will be made at the planning application stage.

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

See above text.

Attached documents: Blackwell Park Local Plan Transport Statement for Reps 10_7_17[1].pdf (754 KB) Blackwell vision and development concept july 2017.pdf (7.8 MB)

Comment ID: pslp172/2489  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

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

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

POLICY A59: New rail station at Guildford West (Park Barn)

The University supports this new policy in principle. This new rail station is an important element of the local plan strategy. However, we note that it does not allocate land for the south side facility for taxis, buses, disabled parking and ‘kiss and ride’ referred to in the policy, nor the southern connection to the local road network. This calls into question its deliverability.

The plan should provide more information on how this will be delivered.

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

See above text.

Attached documents:

Comment ID: pslp171/866  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy E4

The University supports the changes to this policy.

Para 4.4.41

The University supports the change to reflect the number of homes now being provided at the Blackwell Farm site (Policy A26; up from 1650 to 1800).

An amount to be provided in the plan period (1500) is also mentioned, but the University understands that this is not a constraint and is included for the robustness of GBCs phasing proposals. It is understood that the plan is not seeking to prevent the full 1800 from coming forward in the plan period if infrastructure provision and market conditions allow.

The reference to the 1500 homes in para 4.4.41 should therefore make this point clear.

The University notes that para 4.4.41 refers to 35,000 sq m of employment land in total at the site, of which 30,000 will be in the plan period. However policy A26 now refers to only 30,000 sq m in full.

The University therefore considers that there is possibly an error in this statement in para 4.4.41. The text in this paragraph should be consistent with Policy A26 and refer only to 30,000 sq m.

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

See text above.

Attached documents:

Comment ID: pslp171/864  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

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

Policy H1: Homes for all

The University considers that the changes to the student accommodation text of Policy H1 make some limited progress to meeting the University’s previous comments and these changes are supported, namely:

- the reference to full time Guildford based students
- the first sentence of the policy is now expressed in a positive tone and is neutral on institutions.
However the changed policy wording regarding ‘About 60%...expected to be provided with accommodation’ is still not sound, and the University’s previously expressed concerns remain. These are fully articulated in the original submission so are not repeated here.

The University therefore supports the first sentence of the policy text, reading “Purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate”.

The University suggests that the following policy text should be deleted from the policy:

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

The text to be deleted is not necessary in the policy. The policy should not give the impression that there is an obligation, requirement or expectation on the University to provide a particular level of accommodation on campus. The University does, and will, provide accommodation on campus according to the availability of land on its estate and the ability to finance such development. Local plan policy should enable it to do so without implying a specific level to be achieved.

Para 4.2.18

The University notes that the changes to the first 2 sentences of this paragraph are broadly in line with comments we have previously made regarding full time Guildford based students and using sites in sustainable locations close to higher education establishments.

However, the University objects to the changed text that states: “however, we will resist purpose built student accommodation on sites allocated for C2 or C3 use class housing.”

This is because the provision of student accommodation on sustainable sites close to the University will help to reduce pressure on general market housing in Guildford. If allocated sites have not already come forward for the C2 or C3 use described in the allocation, then it would be appropriate for them to be used for student accommodation if a developer were to propose that use.

That part of the text in para 4.2.18 should therefore be deleted as it is unduly restrictive.

The change in the third sentence from ‘required’ to ‘expected’ is supported. The University already provides a significant amount of accommodation for its students on its estate, and it intends to build more to provide ‘a proportion’ of student accommodation on campus, as stated in the sentence.

The change to the fourth sentence makes it clear there is provision in the housing target for full time Guildford based students living in market housing. This change is supported as it acknowledges this important part of the overall student accommodation picture.

Para 4.2.19

The deletion of the text from this paragraph is supported.

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

See text above.

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

Policy ID1: Infrastructure and delivery

Whilst supportive of the principle that development should be phased with delivery of infrastructure, the University notes that the delivery of the new homes proposed in the plan is urgent and pressing.

Strategic sites that have the ability to deliver some of their homes early should not be delayed unnecessarily if they can demonstrably be delivered in a way that takes account of infrastructure issues such as traffic generation and road capacity.

The Blackwell Farm allocation (Policy A26) is in a very sustainable location that offers significant opportunities in this regard, including the ability to link to the Sustainable Movement Corridor from west Guildford to the town centre; a new access to the A31 that can divert some traffic away from the A3; the ability to provide key worker homes for staff employed at the University of Surrey and other locations in the west Guildford area, such as the Royal Surrey County Hospital and the Surrey Research Park. This would reduce the trip generation and pressure on existing road infrastructure in the area. The phasing of development in conjunction with off site infrastructure provision/improvements needs to take this into account. Further information is provided in the PBA transport statement submitted with these comments.

The policy should include the following:

“The phasing of development in conjunction with off site infrastructure provision/improvements will be considered on a site by site basis, acknowledging planned investments, the nature of the proposals and that there are sites that may be better placed to proceed in advance of others.”

The University notes that various road improvements are proposed in the infrastructure schedule. The University considers that further details are needed of what is envisaged at each location. It is recognised that the IDP will evolve alongside the evidence base in terms of mitigation measures.

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

See text above.

Attached documents: [Blackwell Park Local Plan Transport Statement for Reps_10_7_17[1].pdf](754 KB)
POLICY ID3: Sustainable transport for new developments

The University supports the changes to this policy that seeks to secure sustainable transport. The allocation at Blackwell Farm is a sustainable location for development as discussed in the PBA transport statement submitted with these comments.

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

Attached documents:  Blackwell Park Local Plan Transport Statement for Reps_10_7_17[1].pdf (754 KB)

Comment ID: pslp171/909  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

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

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

The addition of the AGLV to the policy title gives the impression of equal status with the AONB. The AGLV is a local designation and not a national designation. This is not clear either from this change to the title or in the policy text itself, thereby giving the impression of unwarranted equivalence.

If the AGLV is to be referred to in the title then the policy text should be changed to make it clear that the AGLV is a local designation and does not have the same status as the AONB.

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

See text above.

Attached documents:

Comment ID: pslp171/837  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

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

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

Policy S2; Planning for the Borough: our spatial development strategy

The University of Surrey notes that there have been changes to the plan period (from 2013-33 to 2015-34) and to the amounts of development proposed, including a reduction in the number of new homes. It considers that this has potential implications for the plan’s ability to provide the significant boost to housing supply encouraged by the NPPF. The plan is therefore likely to be unsound. Further details on the University’s position are provided below.
**New homes**

The number of new homes to be provided has been reduced from 13,860 to 12,426, albeit over a 19 year period rather than the previous 20 year period.

It is also noted that the amount of homes to be provided is now expressed as a minimum (‘at least 12,426’), and the University supports this wording change as it recognises that the plan should provide for at least this number and could provide for more. This addresses a comment made by the University at the previous consultation.

The University notes that, as previously, the plan seeks to meet the Objectively Assessed Need (OAN) for new homes, an approach that the University has supported.

However, there has been a change in the OAN to 654 homes per year, a decrease from the previous version of the plan (693 homes per year).

The University considers that the impact of meeting unmet needs from within the West Surrey HMA does not appear to have been fully addressed in these changes to the plan. It is apparent that there is unmet need of 3150 homes arising from Woking and that Guildford should be playing its part in helping to meet this. This matter was raised by the Inspector at the Waverley local plan examination hearings on 27 June 2017.

The Inspector at the Waverley hearings also considered that there needed to be a significant uplift in Waverley for affordability reasons.

Whilst recognising that the Waverley Inspector’s comments are made at the examination hearings of a different plan, the University is aware that the comments are in the context of the same HMA, encompassing Woking, Waverley and Guildford together.

The result is that the OAN figure of 654 homes per annum in the current Guildford local plan (lower than the 693 per annum that was in the 2016 Submission Plan) is likely to be on the light side and may well have to rise to take account of a proportion of Woking’s unmet need and a greater uplift to address affordability.

The University notes that in this context it is likely that more land will need to be found to accommodate a higher OAN, and the plan therefore appears to be unsound on the issues of addressing OAN and identifying enough land to meet the requirements of development.

However, it is acknowledged that there are infrastructure constraints that require ‘backloading’ of much of the housing delivery towards the end of the plan period. A greater housing number would need to take account of this.

The plan addresses the infrastructure constraint and backloading by assuming that a proportion of the strategic site delivery around Guildford might spill over beyond the plan period. This approach may be appropriate for an element of additional provision.

In this respect, the University notes that the Blackwell Farm allocation (Policy A26) has been reduced in size since the draft plan (Regulation 18) consultation, with the removal of land to the south of the current allocation. There was a consequent reduction in the site capacity from 2250 homes to 1800 (approximately). Should the OAN be revised upwards from the 654 now proposed in the targeted changes, and GBC need to identify further land to meet a higher OAN, then the reinstatement of the part of the Blackwell Farm site allocation that was previously removed would help to meet an increase. The removal of the land was not because the land was unavailable (it is available) or of new evidence of hard constraints to development (no new evidence of previously unknown constraints has emerged), but because of a change in the green belt study methodology. The suitability, availability and deliverability of the land has not changed.

The re-allocation of this land as part of the Policy A26 requirement would see a total allocation of 2250 homes (an additional 450) of which it could be assumed that 750 (rather than 300) would be delivered beyond the plan period. This is well within the capacity of the whole site.

In respect of the likelihood that there will continue to be limits on the amount of land that can be found on previously developed sites in the urban areas, and that the most sustainable locations for growth will be around Guildford town, the
plan should also amend the green belt boundary through this local plan review to identify safeguarded land that is to be released for development in a future local plan review. The NPPF allows for this approach, and indeed encourages it as it means that green belt boundaries are not continually altered with each plan review.

Whilst the Draft local plan in 2014 had some areas of safeguarded land, these have been removed and the plan currently makes no provision. It is the University’s opinion that the plan is not sound without an element of safeguarded land. This is because the plan will not be effective; it will not guard against the need for further green belt boundary changes in the next plan period. This point has already been made in the University’s previous comments on the 2016 Regulation 19 plan.

This current consultation is accompanied by an updated Green Belt Toic Paper (2017) that addresses the reasons why the Council has chosen not to provide safeguarded land. The University's comments on this updated topic paper on this issue are attached.

**Housing target table**

The University notes that the annual housing target table accompanying policy S2 sums to 9,810. The supporting text at 4.1.9a specifically states that the total in the table is 12,426. This is clearly not the case, and this should be explained.

Looking at the Housing Trajectory in the LAA addendum published with the plan, the following is apparent. The cumulative annual total from 2015/16 to 2033/34 (start and end dates of the plan) at 654 per annum is 12,426 (654x19).

The total for the 15 years from 2019 to 2034 that are identified in the table is 9,810 (654x15).

Hence the statement in para 4.1.9a that ‘the figures set out in the Annual Housing Target table sum to a total of 12,426 homes’ is wrong, as that table starts at 2019/20 and does not include the provision from 2015/16 to 2018/19. This statement should therefore be corrected and a clear explanation be provided.

The University notes that the Housing Trajectory in the LAA shows a projected figure of 13,581 completions over the plan period, being 1,155 greater than the target (and the OAN). It is said that this over provision provides a buffer (of just less than 10%) and this gives flexibility to meet the target (OAN) of 12,426.

The University notes that the phasing starts late; the plan covers 2015-34 but the table says nothing about what has been provided 2015 to 2017 or will be provided 2017-19 (it starts at 2019-20). It is apparent from the Housing Delivery Topic Paper that completions and outstanding capacity since 2015 are included in the 13,581 provisions figure stated in the LAA. It would be helpful to have some reference to the whole picture in the local plan itself.

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

See above text.

**Attached documents:** [Green belt topic paper 2017 comments.pdf](#) (91 KB)
1. We support the proposal to move the village curtailage line to include all the land at Fangate Manor Farm, East Horsley.

2. We note that GBC has included the land at Fangate Manor Farm in the Land Availability Assessment for development, although there are no immediate planning proposals for this.

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

Attached documents:

Comment ID: PSLPA16/2347  Respondent: 8967617 / Robin Gill  Agent:

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

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

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

1. We support the proposal to move the village curtailage line to include all the land at Fangate Manor Farm, East Horsley.

2. We note that GBC has included the land at Fangate Manor Farm in the Land Availability Assessment for development, although there are no immediate planning proposals for this.

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

Attached documents:

Comment ID: PSLPS16/7161  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

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

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

3.23 M&G supports the proposed allocation of the North Street site for a comprehensive mixed use redevelopment with an additional 45,000 sq m of retail comparison floorspace. However, it objects to the insufficient quantum of food and drink and residential being proposed.

3.24 In compliance with policy S2 optimum use of the North Street site should be proposed. Policy A6 presently proposes 45,000 sqm comparison retail floorspace and 3,000 sqm food and drink (A3) and drinking establishments. M&G believes that the site could and should facilitate a larger amount of food and drink floorspace. This is particularly important if new leisure uses such as a cinema and cultural uses are to be realised as these uses will need to be supported by an increased offer in food and drink to assist with commercial viability.

3.25 A number of case studies highlight where else a higher food and drink floorspace has been adopted with positive outcomes. The Council’s own evidence base document (the Carter Jonas Retail and Leisure Study) states:
3.26 Leisure uses make an increasingly important contribution to the vitality and viability of town centres and shopping centres, as they provide complementary uses that contribute to both the daytime, early evening and night-time economies.

3.27 Since the early 1990s the commercial leisure sector has experienced significant growth fuelled by buoyant market conditions, growing levels of disposable incomes and low unemployment. During the 1990s this growth mainly occurred in edge and out-of-centre leisure and retail parks, and was usually characterised by large multiplex cinemas and a range of other facilities (including tenpin bowling, bingo, nightclubs, health/fitness clubs, themed destination restaurants, pub/restaurants and budget hotels). However, the tightening of planning policy has resulted in leisure facilities being integrated more into town centre mixed use developments.

3.28 Although the commercial leisure sector has not been immune from the impact of the economic downturn, the latest development trends indicate a move towards leisure-led schemes with multiplex cinemas as important anchors in their own right, along with related catering uses. This is illustrated by the Trinity Leeds scheme where the amount of space allocated to leisure, eating and drinking increased over time to almost one-quarter of the centre’s total floorspace. Other leisure-led schemes include the proposed extensions/refurbishments of Centrale in Croydon and Silverburn in Glasgow by Hammerson, which comprise a new cinema and restaurants. The extension to The Walnuts in Orpington also includes a mix of cinema, restaurants and retail, as do the proposals for new leisure-led schemes in Ealing and Hounslow town centre.”

3.26 In addition to the importance of leisure uses in the schemes highlighted by Carter Jonas’ study, the Westgate scheme in Oxford (see Annex 1) provides for just under 30 per cent of the centre’s total floorspace being allocated to food and drink and leisure uses. Similarly, the proposed West Quay Watermark scheme (see Annex 2) provides for complete flexibility in allocating A1, A2, A3 and A4 uses up to 19,550 sq m plus 19,500 sq m of leisure.

3.27 In contrast Policy A6 provides for just 3,000 sq m of food and drink uses (A3 and A4) and no other leisure uses alongside the allocation of 45,000 sq m of retail (A1). This represents just under 7 per cent of the proposed centre’s total floorspace. This figure is very low by comparison with the schemes referred to above, especially as the North Street scheme is also proposing to include a substantial amount of residential development.

3.28 In response, M&G proposes that Policy A6 be amended to provide for the following quantum of uses:

“45,000 sq m retail (A1), 6,000 sq m food and drink (A3 and A4) and 30,000 sq m of residential (up to 400 units of studios, 1 bed, 2 bed and 3 bed)”

3.29 The provision of 6,000 sq m of food and drink uses (A3 and A4) represents around 13 per cent of the retail proposed and is considered the minimum necessary to deliver a quality shopping experience for visitors and residents. Should a cinema be incorporated within the scheme then additional A3 and A4 together with D2 uses would be required.

3.30 The wording in relation to the bus interchange is supported and is in contrast to the wording used in paragraph 4.4.18 of the Local Plan which suggests that the bus station is replaced on site.

3.31 With these changes in place M&G considers that the proposed North Street redevelopment would have a much better prospect of being realised and, in turn, the Council’s Vision for the Town Centre.

Transport
We believe that replacement bus facilities should be provided off site.

3.32 The reference to the need to fund new bus interchange facilities (BT1) by developer contributions is noted. As indicated in the representations above, the North Street scheme does not have scope to fund a replacement bus station.

Summary
We believe that, with the recommended changes outlined above, the Local Plan policies would be sound and legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16065  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

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

3.11 M&G objects to paragraph 4.4.18 of the Plan which makes reference to: “The bus station in Guildford town centre is defined as a public transport interchange. When it is replaced on site or by a suitable alternative arrangement to be located either partly or wholly on or off site these will be defined as a public transport interchanges.”

3.12 There is no scope to replace the existing bus station on site as part of the redevelopment. Previous schemes have been unviable because of the previous requirement to re-provide the bus station on site. A fundamental assumption of the proposed M&G scheme for North Street is that the bus station would be completely redeveloped. The M&G scheme does not include a replacement bus station, but a series of new on-street bus stop facilities can be incorporated into the proposals to change traffic circulation in the town centre.

3.13 Policy E7 outlines that approximately 1,172 new homes, particularly on upper floors as part of a mixed used development should be accommodated by 2033. The North Street development would contribute to this total.

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

Attached documents:

Comment ID: PSLPP16/16066  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

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

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

3.14 M&G objects to this policy as it is not compliant with national policy on permitted development and, as currently worded, could frustrate the comprehensive redevelopment of the North Street site as proposed in Policy A6. M&G recommends a more flexible approach where redevelopment for alternative uses would assist wider redevelopment objectives in accordance with other Local Plan policies such as Policy A6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3.15 M&G supports Policy E6. It is important that leisure uses are recognised in paragraph 4.4.55 as playing a crucial role in maintaining the vitality and viability of the town centre and contributing significantly to Guildford’s future economic growth. In addition, M&G supports the statement in paragraph 4.4.58 that there is scope for improvement in the scale and quality of the leisure offer. In the context of the proposed North Street redevelopment, food and drink and other potential leisure uses are an integral part of the shopping centre complex and make an important contribution to its vitality and viability.

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

- Attached documents:

3.16 M&G supports the principle of Policy E7 but has some comments for clarification.

The importance of Guildford town centre is recognised in the policy. However, as highlighted in the Council’s own Retail and Leisure study, the Plan should also address the need to maintain and enhance Guildford’s competitiveness as neighbouring centres such as Kingston upon Thames and Woking improve.

3.17 Importantly the town centre is not just about meeting retailing needs. M&G considers that the “overall experience” for visitors must improve as described in the Town Centre Vision extract in paragraph 4.4.74.

3.18 It is correct that the town centre should be the focus for retail developments but it is complementary uses such as food and drink, leisure and cultural uses that add to the liveliness, attractiveness and economic resilience of the centre. New retail-led mixed use schemes are increasingly about creating a distinctive destination and visitor experience as outlined in the Carter Jonas Retail and Leisure study.
3.19 The Plan does not recognise the difference and complementarity of food and drink and leisure uses which are a vital part of new shopping centres as opposed to more freestanding uses that can be spread around the edges of the town centre. It is important therefore that if key objectives such as new cinema or cultural uses are to be realised, they will need to be supported by an increased offer of food and drink to assist commercial viability and not unduly restricted as presently proposed in Policy A6.

3.20 M&G supports the Council’s approach outlined in paragraphs 4.4.83 and 4.4.86.

The town centre will become increasingly more important as a focus of our leisure time, and the enhancement of the riverside, buildings and public spaces between them contribute to this diversification.

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

Attached documents:

Comment ID: PSLPP16/16064  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

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

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

M&G supports Policy H1 which states that development should make effective use of land and a higher density of development would be supported in Guildford town centre. The proposed North Street development is in a prime location to facilitate a high density scheme. It is surrounded by dense urban development with many adjoining tall buildings. The objective to support a higher density of development should be a starting point for policy A6 if it is to comply with policy H1 and S2.

The level of affordable housing should be examined on a site-to-site basis so that major developments are not constrained by the viability of the site. M&G is presently proposing to provide private rented sector housing on the site and believes that a bespoke solution would be best for the North Street proposal.

3.10 Policy A6 suggests only 200 residential units on the site. When this is considered against the Borough wide Policy H1 and the aim of achieving higher density development in more central locations, this quantum should be increased to intensify the use of this sustainably located site. The sustainability of the site can facilitate an increase to 400 residential units of the North Street development.

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

Attached documents:

Comment ID: PSLPP16/16062  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
M&G supports Strategic Objective 11 under Economy which is stated as: “11. Reinforce Guildford’s role as Surrey County’s premier town centre destination whilst protecting and enhancing its cultural facilities and heritage assets.”

However, Guildford’s future prosperity and success as a primary shopping centre should not be taken for granted. The Council’s evidence base document the Retail and Leisure Study 2015 provides a useful context: “1.4 By way of context, although Guildford town centre serves an important role as the largest centre in terms of retail floorspace in Surrey, it is facing strong competition from neighbouring centres where significant new retail and leisure developments are in the pipeline (Section 4).”

M&G recommends that the Plan should acknowledge the competitive nature of retail and recognise the need to make optimum use of the North Street site which is being proposed as the major opportunity to meet this objective (11). There is capacity to facilitate a greater quantum of food and drink and residential and higher density of development than currently allowed for in policy A6. The draft plan should therefore be amended to provide for this additional capacity.

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

Attached documents:

Comment ID: PSLPP16/16069  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

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

3.21 M&G objects to this policy as currently worded as it states that CIL will be collected from “most new build developments”. In view of the commercial challenges and complexities of the North Street site, M&G proposes that proposals outlined for North Street in Policy A2 should be CIL exempt in favour of a bespoke S106 agreement.

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

Attached documents:

Comment ID: PSLPP16/16070  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
3.22 M&G objects to this policy as currently worded. The need for a reference to proposed sites adjacent to the A3 and M25 is recognised but the reference to “other large sites” needs to be clarified. It is M&G’s view that the North Street site will not have a significant impact on the A3 and M25 and should not be delayed while the emerging proposals by Highway England are being finalised. There is an urgent need to enhance Guildford’s retail and residential offer and M&G is proposing to bring forward a planning application for the North Street scheme in 2017 with delivery within the next 5 years.

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

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

Attached documents:

Comment ID: SQLP16/1775  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

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

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

Please refer to the separate responses in question 6 / appendix 1.

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

Attached documents:

Comment ID: SQLP16/1776  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

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

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

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

We consider that the Draft Plan does not fully accord with the National Planning Policy Framework (NPPF) and is therefore not legally compliant at the present time. Whilst these issues are set out below in the detailed responses to draft policies, we summarise here why the draft plan is not fully in accordance with the NPPF.

The NPPF (paragraph 14) sets out the Government’s view of what sustainable development means in practice for both plan-making and decision taking at the local level. For plan-making the Framework states that local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits; either when assessed against the policies in the NPPF taken as a whole, or where specific policies indicate development should be restricted.

The NPPF (paragraph 17) also sets out 12 core planning principles that underpin both plan-making and decision-taking. Amongst other objectives these principles confirm that planning should be:

- plan-led;
- proactively drive and support sustainable economic development to deliver thriving local places;
- promote mixed use developments;
• focus significant development in locations which are or can be made sustainable; and
• deliver sufficient community and cultural facilities and services to meet local needs.

The NPPF is clear that pursuing sustainable development requires “…careful attention to viability and costs in plan-making and decision-taking” (paragraph 173). Plans should be deliverable and, in this context, sites and the scale of development identified in the plan should “…not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened” (paragraph 173).

In relation to the vitality of town centres, the NPPF at paragraph 23 states that planning policies should be positive and promote competitive town centre environments. When preparing Local Plans, some of the key principles that LPAs are advised to follow include:

• recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
• promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
• allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres;
• ensure that the needs for retail, leisure, office and other main town centre uses are “met in full” and “not compromised by limited site availability”;
• recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.

The draft allocation for the North Street site (Policy A6) and associated policies as presently worded fail to fully optimise the redevelopment potential of this major previously developed site within the town centre. This is Guildford’s largest brownfield site within the town centre and the only opportunity to meet its retail needs in the most sustainable location. As presently worded, the Draft Plan does not adequately provide for a sufficient quantum of key uses such as food and drink, leisure and residential which are vital ingredients to a successful flagship retail-led mixed use scheme in terms of vitality and viability.

2.10 Clarification is also necessary in relation to the Council’s proposals for new bus facilities as re-provision of the existing bus station on site would render the scheme unviable. Previous consented schemes have proved to be unviable primarily because of the Council’s historic insistence on providing a replacement bus station on site. As set out in our detailed response to policies S1, S2, H1, E2, E3, E6, E7, D1, I1, I2, I3 and A6, the Council has not fully recognised the potential to provide for enhanced retail and high density residential development of an appropriate scale and massing on this key town centre site.

2.11 As such the draft policies as written do not sufficiently or proactively drive sustainable economic development at this town centre site, contrary to the core planning principles (para.17) of the NPPF. This is also contrary to paragraph 23 of the NPPF which requires that town centre sites provide customer choice and a diverse retail offer, and are recognised as the heart of the community.

2.12 The allocation of the North Street site for only 200 homes and 3,000 sq m of food and drink does not recognise the development potential of the site to provide a high density mixed use scheme. This is not in accordance with the core planning principles of the NPPF (para.17) which sets out that planning should promote mixed use developments and encourage multiple benefits from the use of land.

2.13 More detailed comments regarding each of the above points are set out in our responses to specific policies within the Draft Plan.

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

Attached documents:
2.15 As set out in the response to question two above (and repeated below), we consider that the Draft Plan does not fully accord with the National Planning Policy Framework (NPPF) and is therefore not sound. Whilst these issues are set out below in the detailed responses to draft policies, we summarise here why the draft plan is not fully in accordance with the NPPF. 2.16 More detailed comments regarding each of the above points are set out in our responses to specific policies within the Draft Plan.

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

Attached documents:
I object to your plan to move the historic settlement boundary of Shalford village. I also object to the proposal to eat into the Green Belt surrounding this delightful village, for new housing. Protect the interests of our children in the future.

I object to the congestion this would add to the access road: Chinthurst Lane.

This plan should be put on ice until the effects of Brexit are more obvious, and immigration levels can be assessed.

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

Attached documents:

Comment ID: PSLPS16/8322  Respondent: 8969441 / A2D Dominion New Homes  Agent: Barton Willmore (Simon Potts)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A16

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

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

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<th>Site A16 Land</th>
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<td>at Gill Avenue</td>
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Do you consider this section of the plan is legally compliant? Yes

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

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

The A2Dominion Group has a ground lease on land within site Policy 16. A2Dominion are supportive of the proposed allocation for Policy A16 and A17. It is a core principle of the Group to continually look to improve their accommodation and services across all of it’s sectors which include key worker, student, social and market accommodation. Policy sites A16 and A17 provide the potential to provide high quality key worker accommodation for the hospital’s need, and much needed market accommodation. The A2Dominion Group in principle would support collaboratively working with Royal Surrey County Hospital to explore opportunities to improve the existing environment within the site.
A proposal that could incorporate strategically relocating existing key worker accommodation for hospital staff, and indeed potentially increasing the quantum of such accommodation is something A2Dominion wholly support, as it also provides the opportunity to deliver the highest standard of modern accommodation going forward. This is key for attracting and retaining the highest quality of staff for the hospital for the services and care it provides for the local community.

If you are proposing a change to the Proposed Submission Local Plan: strategy Yes No

and sites, do you wish to express an interest in participating at the Examination? Yes

Why do you wish to participate at the Examination?

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

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

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/8323</th>
<th>Respondent:</th>
<th>8969441 / A2D Dominion New Homes</th>
<th>Agent: Barton Willmore (Simon Potts)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

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

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<th>Site A17 Land south of RSCH</th>
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<td>Do you consider this section of the plan is sound?</td>
</tr>
<tr>
<td>Do you consider this section of the document complies with the Duty to</td>
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A proposal that could incorporate strategically relocating existing key worker accommodation for hospital staff, and indeed potentially increasing the quantum of such accommodation is something A2Dominion wholly support, as it also provides the opportunity to deliver the highest standard of modern accommodation going forward. This is key for attracting and retaining the highest quality of staff for the hospital for the services and care it provides for the local community.

If you are proposing a change to the Proposed Submission Local Plan: strategy Yes No

and sites, do you wish to express an interest in participating at the Examination? Yes

Why do you wish to participate at the Examination?

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

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

Comment ID: pslp172/102  Respondent: 8970561 / S.A. Hawkins  Agent:

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

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

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

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

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

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

<table>
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<tr>
<th>Comment ID: SQLP16/748</th>
<th>Respondent: 8970785 / Guildford Residents Association (Graham Hibbert)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

I have little confidence that the OAN has been prepared to the highest professional standards and I believe that the figure it produces of 693 dwellings pa is too high. The independent but professionally prepared GRA report confirms my view and indicates that a lower figure of some 500 dpa is adequate to meet even robust growth assumptions. It also points to errors in the SHMA that the Council should have found themselves. The forecast population shifts in Guildford are so different from the other Surrey boroughs that, as the GRA report recommends, it makes eminent sense to consider student movement separately from the movement of other groups in society.

I am amazed that the document does not seek to apply significant constraints to limit overall housing growth, as is clearly demanded by the topography of our town; a gap town surrounded by greenbelt. Our current traffic situation is poor and is limiting the growth that our high tech sector can provide. Yet the transport improvement plans in the Submission Plan do not seem adequate to deal with the current problems and the level of housing growth that is proposed. The proposed level of housing growth is over double the target that has been in place since the year 2000 and our infrastructure development has not kept pace with even that. I am therefore concerned with the adequacy of the safeguards in the Submission Plan to ensure that future infrastructure improvements plans will be in place before future housing development occurs, although I accept that this is what the Council intends.

Tourism is a major industry in our borough and so maintaining the character of the borough is important. The plan intends to move the Green Belt boundaries again, seemingly without adequate consideration as to what it will do the character of our borough. The Green Belt and Countryside Study does not, to my mind, value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

In view of recent technological trends, I believe that the Plan puts too much focus on retail development in the town centre and too little on providing further residential accommodation which would create a more vibrant centre to our town.

Lastly I am not convinced that the Plan adequately addresses current pollution problems in our town, such as air quality and the noise from the A3 that reduces the quality of life of residents from Burpham to Onslow.

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

Attached documents:
I judge that the Submission Plan preparation process has not adequately taken account of national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. To my mind the test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. If there is a case for Green Belt development, it needs to be proven through the application of policy and careful thought would need to be given to the pace at which Green Belt is developed bearing in mind future uncertainties in economic and social development. It would surely not be sustainable to release all potential greenfield options within one plan period, and thereby deny future generations, faced with revised circumstances, any such options.

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

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

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

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

Attached documents:
1. Question 3: Soundness

Much as I want to have an updated plan in place soonest and regret that we do not have one now, I do not find this draft to be sound because:

- The SHMA has not be adequately prepared; in particular I am not convinced that issue of student movements has been adequately addressed
- The use of constraints to reflect the special nature of our borough has been rejected
- The proposed transport evidence and plans do not appear to be complete or adequate to deal with current problems and the level of growth proposed.

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

Attached documents:

Comment ID: SQLP16/937  Respondent: 8971073 / Christine McCaffrey  Agent:

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

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

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

Very comprehensive and if implemented within the foreseeable future, will undoubtabley put severe strain of existing roads, schools, medical services etc.

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

Attached documents:

Comment ID: PSLPA16/4248  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: sang.png (330 KB)

Comment ID: PSLPA16/4249  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

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

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

Introduction

We refer to the above consultation paper and write on behalf of our client, Taylor Wimpey (Strategic) Ltd., setting out a number of comments upon the policies and proposals contained in the Proposed Submission Local Plan, including some made on Policy A46 (Land to the south of Normandy and north of Flexford) which refers to a proposed site allocation comprising residential led mixed use development.

Our client has a controlling interest in the majority of the land between Normandy and Flexford proposed to be allocated under proposed Policy A46. We support the policy and can confirm that the site is deliverable in the form and timescales set out in the submission version of the Plan (see also the Housing Land Availability Assessment). However we do consider that the site allocation boundary should be revised to ensure the anticipated level of development can be delivered in full. This suggested revision is illustrated on the annotated version of the policy map using red hatching. Such an amendment would result in a more effective site allocation, consistent with the boundaries defined by the revised Green Belt boundary. We also propose an amendment to the policy having regard to education provision as discussed below and an amendment to the timescales for delivery such that the site can deliver 1 year earlier.

Our representations relate to the following policies:

• Policy S2 (Borough Wide Strategy)
• Policy P2 (Green Belt)
• Policy A46 (Land to the south of Normandy and north of Flexford) Our representations are accompanied by the following:
  • Duly Completed Response Forms
  • Illustrative Masterplan CSA/2516/110/D
  • Wyke SANG Location Plan

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

Attached documents:

Comment ID: PSLPA16/4255  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:

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

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

Suggested Residential Opportunity at Former Highlands Nurseries, Portsmouth Road, Ripley

My client controls land at the former Highlands Nurseries, Portsmouth Road, Ripley site extending to approximately 1ha. The attached Location Plan shows the extent of the site and context of the surrounding area. In addition, a satellite view of the site is provided below.

The site comprises vacant land previously used for nursery purposes, located in the Green Belt. It is not presently in any private or publicly beneficial use. It forms a field contained on its western side by existing vegetation and on its northern and southern sides by residential properties fronting onto Portsmouth Road. It benefits from an existing vehicular access direct onto Portsmouth Road and lies between the settlements of Ripley and Send Marsh. The site is located entirely in Flood Zone 1 and unlike much of Ripley Parish is not located in the Conservation Area or in close proximity to any listed buildings.

Proposals

These representations are accompanied by the following drawings:

- Location Plan
- Site Plan
- Typical Street Scene.

The proposed scheme includes 7 no. affordable dwellings as part of the overall 20 no. dwellings proposed. The illustrative mix underpinning the proposed site plan comprises:

- 2 no. 1 bedroom affordable maisonettes;
- 2 1 bedroom affordable apartments;
- 3 2 bedroom affordable apartments;
- 6 3 bedroom market semi-detached houses;
- 1 3 bedroom market detached house; &
- 6 4 bedroom market detached houses.

The above housing mix enables the provision of a high proportion of the site to come forward as affordable accommodation, whilst providing a mix of housing sizes, tenures and types such that a mixed community could form.

The layout plan shows 20 no. dwellings proposed in a verdant landscaped setting. The use of the existing access point enables the retention of the existing trees on the site's frontage adjacent to Portsmouth Road. As illustrated further landscaping can be introduced throughout the development and in particular on the site's boundaries.

The layout illustrates frontage development that follows the existing building line defined by Thirlestane to the north and Broom House to the south. In this respect, the scheme forms infill development that would read as frontage development located beyond existing trees when viewed from Portsmouth Road. Moving further west, the scheme becomes one of a more conventional low density residential estate, with all dwellings benefiting from generous amenity space and parking provision.

The street scenes provided show the proposed dwellings to comprise two storey development with no rooms in the roofspace, consistent with the prevailing scale in this part of the village. In addition, pitched roofs, gabled features and a variety of materials are proposed so to provide a traditional design and add architectural variety to the development.
The site is well contained and is bound by existing residential development. I therefore write to offer the site as a potential allocation for a residential scheme within the emerging Local Plan.

Summary

In summary, the proposed site represents an opportunity to provide a low density housing development on a self-contained site bound by existing residential development. In addition, a substantial affordable housing provision can be achieved.

We would welcome the opportunity to enter into dialogue with the steering group in order to further discuss a possible role for our client's land an allocation within the Local Plan.

Should you have any queries in the interim please do not hesitate to contact me using the details provided.

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

Attached documents: Highlands Nursery - Coloured Site Plan.pdf (1.2 MB)
sdfsdfsdfsdf.png (259 KB)
Highlands Nursery - Street Scene.pdf (1.2 MB)
16-P1258-LP (Location Plan) 10.02.16.pdf (52 KB)

Comment ID: PSLPS16/7883  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

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

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

<documents attached>

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

Attached documents: a46laaa.png (896 KB)
a46.png (571 KB)

Comment ID: PSLPS16/7884  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Our client has a controlling interest in a significant part of the land between Flexford and Normandy, allocated for residential led mixed use development in proposed Policy A46.

The site lies mid-way between the towns of Guildford and Aldershot in Surrey. It is bound by the settlement of Normandy to the north and Flexford to the south. The Great Western railway line between Guildford and Reading runs adjacent to the site's southern boundary, with Wanborough Station located adjacent to the south east corner of the site. To the north of the site lies Guildford Road (A323), with Westwood Lane to the west and Glaziers Lane to the east.

The site extends to approximately 69ha and comprises a series of medium to large pastoral and arable fields, several woodland copses and a number of small farm buildings.

Informed by meetings held with the Council since 2014, our client has undertaken detailed masterplanning and technical work across the entire site so to demonstrate the deliverability and appropriateness of the land for strategic development. Our representations are supported by a Concept Masterplan. Background technical work has been undertaken in order to inform the content of the masterplan, including highway, drainage, landscape and ecology work.

The attached Concept Masterplan (Plan No. CSA/2516/11 O/D) proposes circa 1,100 dwellings on approximately 28ha of residential development, equivalent to around 37dph which enables the provision of a range of dwellings types in accordance with the findings of the SHMA, including the housing mix at paragraph 4.2.3 of the Local Plan.

The Concept Masterplan shows how the site allocation can deliver strategic benefits for the wider area in terms of supporting infrastructure, consisting of:

- Primary school;
- Secondary school;
- 60 bedroom care home;
- Local centre;
- Playing fields;
- New children's play areas;
- Site travelling show

Clearly the provision of a number of key services and facilities on site provides the opportunity to generate a self-sustaining community in this accessible location. It should be noted that the provision of a primary and secondary school has been developed following detailed dialogue with the Borough and County Councils who endorse this site as the most appropriate location to provide a new secondary school to meet the increased educational demands of growth in the western part of the Borough.

The logic of the site's location is appropriate particularly due to its location adjacent to a train station that offers direct services between Guildford and Reading. The benefits of the site's location for education purposes are referred to at page 580 of the Council's Land Availability Assessment (LAA) (February 2016). It has been agreed with the County Council that there is a need for a secondary school to provide for the western half of the Borough and that this site forms the most appropriate site to deliver such a facility.

In terms of education, we note that Appendix C (Infrastructure Schedule) of the Plan refers to the need for a 7 form secondary school at the Normandy/Flexford site but Policy A46 refers to the secondary school providing up to 8 forms of entry. This inconsistency should be revised so to refer to the necessary 7 form entries. In addition, the policy does not presently refer to the provision of an on-site primary school. By providing 1,100 dwellings, the scheme will necessitate the need for a primary school and we therefore suggest this is added as an additional bullet point. This is consistent with the Concept Masterplan supporting the representations. We therefore propose the wording under the 'allocation' section of Policy A46 is revised as per the below:

'This is a residential lead mixed use development, allocated for:
• Approximately 1,100 homes (C3), including some specialist housing and self-build plots (C3), and
• A nursing or residential care home (C2) with approximately 60 beds, and
• 6 Travelling Showpeople plots (sui generis), and
• Approximately 400 sq m of comparison retail (A1), and
• Approximately 300 sq m of convenience retail(A1), and
• Approximately 400 sq m of services (A2 - AS), and
• Approximately 300 sq m of community facilities (01), and
• A secondary school (01) (up to eight seven form entry), and
• A primary school (01) (up to two form entry); and
• A village green’

The identified need of travelling show persons pitches can be met in part on site A46. The subject site provides one of only two site allocations identified in the Local Plan to meet the needs of this specific group and therefore provides a vital contribution towards defined needs for such accommodation as defined in Policy S2.

It is considered that the mix of uses proposed forms a key element in creating a successful and sustainable neighbourhood, which will deliver a range of benefits, as follows :

• A number of community focal points spread throughout the development, with a natural landscape buffer existing between the two villages so to give the development a two village character ;
• Convenient access to facilities;
• Architectural interest created by non-residential buildings, whose status and function will create new local landmarks;
• Opportunity for innovative sustainable building technologies to be used in non-residential buildings;
• Greater opportunity for social interaction due to greater pedestrian activity; &
• A greater feeling of safety, with 'eyes on streets'.

The Masterplan accounts for the site's existing environmental features, which include woodland and tree belts (including designated ancient woodland) and a public footpath running between Glaziers Lane and Westwood Lane.

The new parkland is envisaged to incorporate multiple functions and uses, including new sports pitches, children's play areas, new routes for walking and cycling and areas for informal recreation. The existing woodland , trees and hedgerows will form an integral part of the parkland, providing an instant sense of maturity to the new public open space. The areas of ancient woodland will have restricted access to ensure their ecological value is protected and benefit from 15 metre buffers consistent with national guidance. In total the Concept Masterplan accommodates approximately 29ha of green infrastructure.

The local centre, primary school and care home are proposed to be located close to one another in order to encourage residents to make multi-purpose trips to the local centre. A bus route is illustrated to run through the site, enabling all future residents to live within a short walking distance from a bus service. Further the secondary school is purposely sited on the site's southern side so to facilitate sustainable transport movements via Wanborough station.

The site benefits from a location within walking distance of the services and facilities in both Normandy and Flexford. It is well located in terms of proximity to a number of key services and transport connections .

Clearly, the above service offer will be further assisted by the additional services that would be constructed as an outcome of the proposed scheme. It is further noted that the provider, Great Western Railway, are presently carrying out upgrades to the train line running through Wanborough, which will result in improved services. Clearly the additional patronage generated by the proposed development will only further support the viability of this service.

Highway Considerations

Detailed technical highway work has been undertaken by Odyssey Markides who have identified that the surrounding road network has adequate capacity to accommodate the level of proposed development. Access to serve development of the site is proposed from Westwood Lane and Glaziers Lane.
The site is located adjacent to Wanborough railway station which provides frequent services to Guildford and Ascot via Aldershot as well as some direct services to Reading and Gatwick. Two bus routes serve the site and there is potential to divert these through the site to make these services closer for future residents, a matter which can be addressed/funded/ secured by means of a legal agreement as part of the subsequent planning application. In short, re-routing buses into the site, providing access to the schools and the local centre, will serve to enhance the sustainability merits of the wider area, including for the existing nearby villages.

Flood and Drainage Considerations

Flood and drainage considerations have also been assessed by Odyssey Markides. The site is predominately located outside the floodplain in Flood Zone 1 and is well positioned to deliver residential development in accordance with the NPPF thus satisfying the sequential approach in the SFRA. A proportion of the site in the vicinity of Walden's Copse is located in Flood Zones 2 and 3. However, the proposed development footprint will be positioned outside the floodplain in accordance with the Sequential Approach and in order to reduce impact to the floodplain and flood risk downstream.

A drainage strategy will be developed in accordance with EA requirements including proposals to enhance the existing watercourses within green corridors, dry swales and attenuation basins to ultimately discharge surface water runoff at existing greenfield rates downstream of the site. For these reasons, matters relating to flood risk and drainage should not impede the development of the site.

Ecological Considerations

Our client is aware that the proposed residential scheme requires the delivery of a Suitable Alternative Natural Greenspace to provide mitigation for potential recreational impacts to the Thames Basin Heaths Special Protection Area ('TBH SPA'). Accordingly our clients have agreed an off-site SANG provision 0.5Km to the west of the site at Wyke (see SANG location plan attached). This is linked to the site by way of an existing public footpath and enables the efficient use of the site for residential and associated development, whilst providing new walking areas to the benefit of both new and existing residents.

Initial walkover surveys have been undertaken on both the Wyke SANG and the proposed allocation under policy A46 and show that nature conservation interests within the site are concentrated to the areas of ancient woodland, broadleaved woodland, mature trees, hedgerow and the watercourse that runs through it.

Deliverability & Trajectory in the LAA

The Borough Council's housing trajectory set out at page 20 of the LAA suggests out that the Policy A46 allocation site could deliver 50 completions in 2021/2022, with delivery increasing in subsequent years. Clearly there is a need for strategic sized sites, such as that controlled by our client in order for the Council to be able to demonstrate a continuous 5 year housing land supply throughout the plan period. Its development credentials have been acknowledged in its proposed allocation and the site suffers from no technical constraints to delivery. The site is controlled by a national house builder, who has secured appropriate off-site SANG mitigation land at Wyke (SANG location plan attached) and is undertaking detailed survey work to enable a timely outline submission upon adoption of the Plan. Consequently the site offers the opportunity for material delivery within the 5 year period and at an earlier date than presently envisaged.

We consider the site could deliver 50 dwellings in 2020/21 and thus propose that the site's delivery is brought forward by one whole year in the LAA. Such an approach would assist in meeting the defined and pressing needs discussed in our response to Policy S2.

Summary

Our clients support the removal of the Land between Flexford and Normandy from the Green Belt and the proposed allocation of the land as set out in Policy A46. However we consider that the supporting boundary map should be revised as illustrated on the supporting plan and certain policy wording amendments should be made. These amendments would result in a more effective plan and enable the efficient and effective use of the site for residential led mixed use development.
On the basis of the foregoing, we propose the following changes to Policy A46:

**Proposed Changes:**

*Land allocation map (on page 231) to be amended to include red hatched area as illustrated on supporting plan.*

*Wording changes to include provision of a primary school and amend numbers of form entries at secondary school to 7 consistent with Appendix C.*

*LAA to phase delivery of Policy A46 site one year earlier.*

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

Attached documents:

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**Comment ID:** PSLPP16/17370  **Respondent:** 8971137 / Woolf Bond Planning (Thomas Rumble)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

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

Paragraph 54 of the NPPF refers to rural exception sites as follows:

'In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs'.

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

'market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable'

The above wording would enable Policy H3 to be more consistent with national policy in accordance with the NPPF tests of soundness.

**Proposed Change:**

The addition of the wording suggested above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The Plan includes provision of considerable land in the Green Belt to be used for Suitable Alternative Natural Greenspace purposes. Our clients control land at Cricketts Hill Farm, Wyke for this purpose (location plan attached). It is within a short walking distance of the proposed strategic site and will meet the SANG tests applied by Natural England.

We propose that Policy P2 includes some wording that confirms that the use of land in the Green Belt for SANG purposes will be supported on the basis that this is an appropriate facility for outdoor recreation purposes.

Proposed Change:

Additional wording to confirm that the use of land in the Green Belt for SANG purposes will be supported and the identification of the site on the Proposals Map for SANG purposes.

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

Updated 2014 based household projections were issued by CLG earlier this month. These revealed an uplift in the household projection for the Borough from 499 dwellings per annum (2012 based projections) to 538 dwellings per annum. It follows that the need to maximise delivery at the strategic sites is yet more pressing given these revised projections. For these reasons, we propose that Policy S2 is amended to include the words ‘a minimum’ in front of the housing requirement, as per the below:
During the plan period (2013-33), we will make provision for a minimum 13,860 new homes, 37,200 - 47,200 sq m of office and research and development (81a and b) floorspace and 4.7 - 5.3 hectares of industrial (81c, 82 and 88) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional 8 class jobs.

We also object to the proposed phasing of the annual housing target as set out in the policies. Such an approach is inconsistent with the framework that requires LPAs to significantly boost the supply of housing now. This is especially relevant in Guildford Borough which has been the subject of a long standing housing land supply deficit and has persistently under delivered against identified needs. Consequently we object to the annual housing target table included at the bottom of Policy S2.

Having regard to the site allocations listed in Table 1 (see also page 123), we consider our site represents one of the most logical locations for growth, having regard to its highly sustainable location (adjacent to Wanborough Station) and its enabling function in providing land for a secondary school that will meet wider needs across the western half of the Borough.

The revisions proposed above would help safeguard the policy in light of the latest CLG household projections and be consistent with paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

**Proposed Changes:**

The addition of the wording 'a minimum'.

Removal of the 'annual housing target' table at the bottom of Policy S2.

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

**Attached documents:**

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**Comment ID:** PSLPP16/17369  **Respondent:** 8971137 / Woolf Bond Planning (Thomas Rumble)  **Agent:**

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

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

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

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**Introduction**

We refer to the above consultation paper and write on behalf of our client setting out comments upon the policies and proposals contained in the Proposed Submission Local Plan.

Our client has a controlling interest in land at Former Highlands Nurseries, Portsmouth Road, Ripley. The proposed site represents an opportunity to provide a low density housing development on a self-contained site bound by existing residential development. In addition, a substantial affordable housing provision can be achieved.

The National Planning Policy Framework (NPPF) and the Tests of Soundness

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.
Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

POLICY S2: Borough Wide Strategy

Updated 2014 based household projections were issued by CLG earlier this month. These revealed an uplift in the household projection for the Borough from 499 dwellings per annum (2012 based projections) to 538 dwellings per annum. It follows that the need to maximise delivery at the strategic sites is yet more pressing given these revised projections. For these reasons, we propose that Policy S2 is amended to include the words 'a minimum' in front of the housing requirement, as per the below:

'During the plan period (2013-33), we will make provision for a minimum 13,860 new homes, 37,200 - 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 - 5.3 hectares of industrial (B1c, 82 and 88) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

We also object to the proposed phasing of the annual housing target as set out in the policies. Such an approach is inconsistent with the framework that requires LPAs to significantly boost the supply of housing now. This is especially relevant in Guildford Borough that has been the subject of a long standing housing land supply deficit and have persistently under delivered against identified needs. Consequently we object to the annual housing target table included at the bottom of Policy S2.

The revisions proposed above would help safeguard the policy in light of the latest CLG household projections and be consistent with paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

Proposed Changes:

The addition of the wording 'a minimum'.

Removal of the 'annual housing target' table at the bottom of Policy S2.

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

Attached documents:
Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

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

Attached documents:

Comment ID: SQLP16/1949  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

In accordance with the provisions at paragraphs 3.11 and 9.28 of the 'Procedural Practice in the Examination of local Plans' document (June 2016) (41h Edition), we request the opportunity to appear at the Examination in order for the soundness of the Plan to be determined, in particular having regard to its soundness in terms of the ability of Site A46 to deliver and contribute to meeting the housing requirement set out in Policy 82.

We trust the above comments are of assistance in producing a finalised version of the Local Plan prior to submission and await confirmation of receipt of our representations in due course.

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

Attached documents:

Comment ID: PSLPA16/1712  Respondent: 8971233 / Tim J. Harrold  Agent:

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

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

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

Green Balance Review of Objectively Assessed Need (OAN)

CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Heam West Surrey Strategic Housing Market Assessment (SHMA) for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.
Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

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

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

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

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

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CPRE OBJECTION TO POLICY A25 : Gosden Hill Farm, Merrow Lane, Guildford

CPRE has many reasons for considering this proposal unsound which are listed below:

1. The land which is proposed for development is all open Green Belt countryside of an attractive character which it is now suggested should be surrendered to urban. The NPPF states "the essential characteristics of Green Belts are their openness and their permanence". Boundary changes to the Green Belt can only be made at the time of a Local Plan consultation in "exceptional circumstances". The draft Local Plan does not provide sufficient detailed evidence of the strategic development proposed to meet this requirement. The Green Belt between Burpham and West Clandon forms part of the green approach to Guildford and provides a clearly defined boundary to the urban area. Much of the building proposed falls within the Parish of West Clandon but the principal impact of the traffic from the new site will be experienced in Burpham which already suffers badly from congestion and air pollution. It is felt that a better solution to these problems is required.

1. The proposal cannot be considered seriously until Highways England have decided how the A3 infrastructure can best be handled in this area. No decision is likely to be made by them until at the earliest 2020. Their policy requires that 4 way junctions have to be set at a specified distance apart which at the moment seems to rule out the use of land adjoining Potters Lane.

1. It is equally important that a decision is made about a possible tunnel for Guildford as it will be necessary to decide where provision for access should be made in the vicinity of Burpham. It is not known exactly what route the tunnel will follow but Compton has been mentioned as its possible other entrance. As far as we know, there are only estimates available as to its likely cost and the time that it would take to build. If a tunnel were to be used to link Burpham and Compton, substantial additional road infrastructure would be needed for the 83000 both at Puttenham and Compton.

1. Planning as to whether a railway station at Merrow will be built seems to be uncertain and depends on decisions involving Network Rail. We are informed there is no reference to a railway station at Merrow in the Wessex Plan for future railway development. The station can only therefore be considered in an aspirational category as so few details are available as to its design, exact location, operation, car and bus access and parking provision. Space currently occupied by the Surrey depot in Merrow will understand be used on one side of the track but there is no information as to the rest of the station layout including a bridge over the lines. Road access for the station will probably require the replacement of the railway bridge over Merrow Lane near its junction with New Inn lane (B2234) where lights control the traffic.

1. Before 2000 houses could be built at the site proposed, water supply, the sewage network, and other infrastructure issues would need to be resolved. We are informed that the electricity pylons near the A3 would also need to be changed owing to a capacity requirement.

1. There has been a history of linear development along the A3 in Burpham. The latest example Wey Lea was promised a range of community facilities which we believe never materialised. Burpham residents do not want this experience to be repeated for the proposed new settlement and are doubtful from past experience that undertakings in this context will be honoured.

1. Plans for a Slyfield Link Road also now appear largely aspirational. There is little confidence either in Burpham at present about the value of plans for a "sustainable movement corridor". It appears that London Road will form part of the SMC with two way traffic in single lanes plus an additional lane in each direction for buses and cycles. It is felt that this will add to an already difficult traffic situation.

1. The Burpham Community Association issued the following statement at a well attended public meeting on 11th July 2016 regarding development of Gosden Hill Farm and it’s “huge impact” on Burpham: “Two thousand homes, offices and industrial sites, a Park and Ride for up to 1,000 cars, two schools and the possibility of a new station at Merrow will put thousands more vehicles on to already very congested roads. Access to the proposed development is by a new A3 southbound off/on slip road and the present slip road to Burpham and Merrow will become two way. This means that all traffic from Gosden Hill wishing to use the northbound A3 will have to drive through Burpham to the Clay Lane slip”. The BCA goes on to say that “the only sensible solution is a four way intersection around Potters Lane as proposed in the 1980s, which would give north and south bound access to...
the A3. If it is decided that a tunnel is the only answer to Guildford's traffic congestion, then it is short-sighted to dump homes and all the associated infrastructure on the most suitable land for a tunnel entrance."

1. The other A3 entrance to the possible tunnel may need to be located at Compton which also suffers heavily from road traffic congestion and air pollution on the CPRE does not pretend to have the necessary engineering knowledge as to the practicability of such a solution nor of the possible cost and time needed for its implementation. We do, however, know something about the successful introduction of the Hindhead tunnel in Waverley and we recall that it was clearly indicated when the decision was taken to go ahead there, that the former traffic congestion at Hindhead would reappear at Guildford a few miles down the A3 once the tunnel was built. This has duly occurred. It would seem logical that if an A3 tunnel is considered desirable at Hindhead to keep the traffic flowing and also protect the countryside, then surely it should at least be considered as a possible solution now at Guildford to reduce congestion and improve the urban environment and quality of life of those living in and visiting the county town.

1. The evidence on future traffic conditions which is produced in the Strategic Highway Assessment Report (SHAR) has been produced late and is unfinished. This vital input has not been available in time for it to inform the draft Local Plan or the subsequent consultation. CPRE considers that this whole proposal is not ready for enclosure in the draft Local Plan and is therefore unsound.

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

Attached documents:

Comment ID: PSLPS16/3328  Respondent: 8971233 / Tim J. Harrold  Agent: 

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

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

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

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

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

1. Description

CPRE objects to this site being described as within the "Guildford Urban Area". It is in fact within Green Belt countryside in Shalford and Worplesdon wards and forms part of the Hogs Back to the South which is within the Surrey Hills AONB and AGLV. It is a mixture of farmland and ancient woodland and is criss-crossed with footpaths. Across its agricultural fields, there is a long distance view of the Guildford Cathedral tower from the single track driveway to Downs Place with its attractive avenue of trees. This development has been objected to by a wide range of Parish Councils including Arlington, Compton, Puttenham, Wanborough, and Worplesdon.

1. Ownership

CPRE does not agree with the categorization of this land as "Private" when it is in fact owned by the University of Surrey, a semi public body. In our opinion it would be better for this to be stated. Ownership needs to be clarified, especially as the Vice Chancellor's official house is located there, with an adjacent illuminated car park, a number of semi derelict farm buildings and a few cottages.
1. Research Park

The Research Park is owned by the University. It still has room to expand on its existing area which was originally allocated as open green fields. However, this land has not been used efficiently. It has a very low density building layout and a large amount of surface parking for cars which take up a great deal of space. CPRE maintains that the provision of a multi storey or underground car park would free up more space or alternatively new offices or other buildings could be built similar in design to the WWF HQ in Woking with parking at ground floor level and office accommodation above. CPRE does not accept that Green Belt land from Blackwell Farm should be taken for further development of the Research Park since the University already has spare space to accommodate expansion there.

1. Housing

The amount of housing for this site is 1,800 homes and 6 Traveller pitches, together with a primary school. Added to this is provision for convenience retail and a new Local Centre for community services and uses. We assume that delivery vehicles will be required for these facilities. We estimate that the new development would add 3,000 extra cars to the existing traffic congestion in the vicinity. The proximity of the hospital site would further complicate matters in terms of access and sustainability. It is our opinion that heavy existing congestion at the Egerton Road A3 roundabout would be substantially increased by this development.

CPRE understands that the University has made an undertaking to provide extra housing accommodation at Hazel Farm which has still to be met. Because of its proximity to the Thames Basin Heaths SPA, it is suggested that this requirement could be achieved by the building of a retirement care home. For some unexplained reason this has been omitted from the draft Local Plan.

1. Infrastructure

Access to this site from the Egerton Road A3 Roundabout via Gill Avenue will become even more congested were the proposed new development of 1,800 houses to be built.

Sustainability therefore is said to depend as a result on the provision of a new road to and from the A31 and maybe the building of a new railway station at Guildford West in Park Barn.

A technical report by RGP has been prepared concerning this proposed new road link to and from the A31 which questions the viability of this proposal. It appears that a range of technical and financial challenges would have to be overcome. These include whether the width of the existing roads is adequate to handle the anticipated traffic load and the existing bridge able to take the weight of the vehicles using it. The provision of an extra new road with a possible extra bridge would of course be very unsightly. There are also safety considerations that need to be taken into account in view of the history of personal injury accidents near the proposed new 4-way traffic light junction where the Down Place access road joins the A31.

CPRE questions whether the proposals for this junction is a realistic proposition. RGP indicates that the preferred highways solution would be best served by a roundabout. It is very likely that whether traffic lights or a roundabout was built, there would be a requirement for street lighting which would be harmful to the AONB and be visible from a long distance to the North. In our opinion this is sufficient ground in itself to make this proposal unsound.

We do not consider that either of these possible alternatives will provide a practical solution to the traffic congestion that already exists at this point of the A31’s approach to Guildford. The prospect of vehicles (including ambulances for the hospital) using this road to avoid congestion at the A3 Egerton roundabout is daunting, particularly at peak periods of the day. Should the proposed access road to the A31 be built, we would anticipate that it will be used by a very large quantity of traffic which will stretch back from the A31/A3 junction and the traffic lights at the A31/Downs Place cross roads. The whole proposal would have to be assessed for viability by Highways England. We believe that it is premature to submit such an uncertain plan until better assessment is available of cost and viability.

1. Countryside Harm and Urban Sprawl

From this policy presentation, it is hard to believe that the countryside at stake has been seriously considered. We are talking about an urban sprawl encroachment of 1,800 houses on the edge of the town which will make the existing
congestion there worse rather than better. The new development will therefore depend for its sustainability on a yet unbuilt road adding congestion to the already difficult A31 traffic situation and undermining beautiful Hogs Back countryside which is recognised by everyone who knows it as a unique landscape location. Its magnificent views should be protected and enhanced rather than undermined in the way proposed. We are also talking about Green Belt land, which would be classified as highly sensitive by impartial observers, that borders the nationally important Surrey Hills AONB and AGLV with its views of the adjoining countryside stretching away to the North. It would surely be unforgivable if this were not conserved for the future rather than irretrievably harmed to meet local priorities for growth which are unsustainable.

The Pegasus Report on Green Belt and the Countryside has taken the totally arbitrary position that this site should be considered only of "medium sensitivity" as it fulfils just 2 of the 4 purposes of the Green Belt, which are in this case checking urban sprawl and protecting the countryside from encroachment. It does not take account of the site's historic setting. This far too simple approach totally fails to recognise how well this attractive Green Belt site fulfils these two very important purposes. We concur that the site cannot serve the function of preventing coalescence as there are large distances to the next settlement but this surely cannot lessen the importance of the roles it does perform. It is an unique location adjacent to both AONB and AGLV land which are also within the Green Belt. It is in fact one of the most important sites in the Guildford area. We therefore object to the categorization of this Green Belt countryside as of only "medium sensitivity" and request that the Inspector walk through this landscape so that he can see for himself and make his own judgement as to the

importance of this location. Even though, after widespread public objection, the site has been reduced in scale to 1,800 houses, to lessen to some extent its impact on the Hog's Back, the access road required to the A31 will have a serious adverse effect on this beautiful natural landscape and protected countryside. This harm will be made even worse at the A31 junction if street lighting has to be installed. We do not agree that just because the Green Belt site has only passed 2 elements of the Pegasus test it can be said to have "failed" and therefore be considered for development. We further do not agree that the "benefits" for the allocation of this site add up to the "exceptional circumstances" required for a Green Belt boundary review which would justify the harm it will cause to this very unique countryside.

1. Landscape Evaluation

In 2007 GBC and Land Use Consultants published its Guildford Landscape Character Assessment & Guidance which includes in section B1a study of the Hog's Back Chalk Ridge. This refers to its panoramic and far ranging views, its pastoral area, and its large-scale geometric fields that dominate the north facing slopes. It refers to the sparse settlement in a unified restrained and rural landscape except for the visual and physical segregation created by the A31 trunk road along the ridgeline with the visibility of moving vehicles and associated noise. This document was made available to Natural England who are committed to carrying out a boundary review of the Surrey Hills AONB and AGLV in this area with a view to rural protection being extended more widely to cover this high quality countryside which is seen to be of potential national importance. Preliminary work in this context has already been undertaken by Hankinson-Duckett for Natural England. The Parish Councils of Compton, Wanborough and Worplesdon have now commissioned a new study report for the draft GBC Local Plan which has been carried out by Landscape Management Services. This indicates that nearly the whole of the 265 hectare Blackwell Farm was of a landscape scenery quality that could merit inclusion within a revised Natural England boundary for the Surrey Hills AONB. Accordingly, we believe that it would be illogical to proceed further with the proposal for Blackwell Farm in the light of so much professional opinion, especially as the new access road to the A31 would be very damaging to a widely extended area of rural countryside and agricultural land, both by day and by night, from extra noise disturbance and light pollution. We believe that this proposal has to be deleted as unsound from the draft Local Plan because of its impact on the AONB and the setting of this very special landscape. CPRE OBJECTION.

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

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CPRE OBJECTION TO SITE POLICY A35 : LAND AT FORMER WISLEY AIRFIELD

CPRE objects to the continued inclusion in the draft Local Plan of the Former Wisley Airfield (FWA) now known as the Three Farms Meadows (TFM). This development was rejected unanimously on 8th April 2016 by the GBC Planning Committee when it was submitted as a planning application prior to the draft Local Plan being published. This decision was recommended by GBC Planning Officers. We can see no justifiable grounds for this development to now be reintroduced. The arguments for its refusal as a planning application are still as valid as before. Our objection to the former Wisley Airfield development reflects exactly our overall opposition to the draft Local Plan in which over 70% of new housing is to be built within the Green Belt. The GBC proposal conflicts with promises made to the electorate in this context.

In our view there is ample brownfield land available in the urban area which should be used for housing instead of attention being concentrated on unsustainable sites in countryside outside the town. No exceptional circumstances have been established to warrant removing land from the Metropolitan Green Belt, which is characterised by its openness and permanence, to permit urban sprawl to spread onto agricultural land in attractive countryside.

We object in particular to the disproportionate allocation of housing to Green Belt land in this segment of the borough. Over 23% of the draft Local Plan’s new housing is supposed to be provided in the immediate vicinity of Ockham, Ripley, Send and the Horsleys, and of this total 65% is allocated to the former Wisley airfield.

CPRE objects to the way in which the draft Local Plan for this site will overwhelm the historic rural village of Ockham nearby - which has only 159 residential houses - and destroy its attractive character and identity that depends on its many listed properties, an absence of street lighting, and very few pavements. This charming small community which can only be accessed by narrow sinuous lanes will be sacrificed to the proposed new development in its immediate vicinity of more than 2,000 houses with high density urban buildings of up to five storeys in height spread out in an urban sprawl of unattractive new construction in open agricultural countryside.

We object to the statement that the new development will result in a significant shift to cycling and walking as a means of conveyance. It is incorrect to suggest that such an isolated built-up location would reduce reliance on private cars as a means of transport to Guildford and neighbouring villages and railway stations. A proposed development of 2,068 homes will result in an estimated 4,000 additional cars on the roads. The added congestion that this will cause on the narrow country lanes in Ockham and surrounding areas will be a source of increased safety hazard to any cyclists and walkers. This will be made worse by the likely increase in bus and HGV movements from the new location with its additional school traffic. No footpaths or cycle lanes are present along these rural roads.

We object to any increase as a result of the proposed new development to the already severe congestion on the A3 and M25 which will require significant infrastructure enhancements.

Work in this context to the A3 South of the site is not expected to be begun until 2019 at the earliest.

We also object to the way in which concern about the harm caused by traffic on the A3 and M25 to Air Quality has been treated with insufficient attention. Air pollution is already known to be a problem in many parts of the borough which needs to be tackled. We understand that for example the A3/M25 junction exceeds EU permitted levels and is comparable to air pollution in Oxford Street in Central London where only diesel traffic is present. The additional congestion that will be generated by the new development and by the proposed expansion of daily visitor attendance at the Royal Horticultural Gardens will only make this problem worse. The relevant authorities are well aware of the adverse impact on the health of local residents and plant life that increased traffic causes in terms of air pollution and will need to give this more urgent priority.
We object to the lack of consideration given to the environmental and ecological value of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and a Site of Nature Conservation Interest (SNCI) which will all be harmed. Traffic noise disturbance has been shown to have a negative impact on bird life which is of particular concern with regard to the SPA.

CPRE notes that concern has been expressed by a wide range of authoritative organisations about this development including Highways England, Thames Water, NATS and the Environment Agency.

The Minister of State has made it clear in a recent statement that housing need and/or demand is not sufficient grounds for encroaching onto open Green Belt countryside and that it is up to "local people" to express their objection to development of this kind. The proposed Local Plan does not meet the needs and desires of local communities. The two top responses in the Ockham Parish Plan call for:

1. Access to the countryside and clean air
2. The peace and quiet of wide open spaces

Over 90% of the local people in this community wish to see both the village's historic features maintained and the former Wisley Airfield now known as the Three Farms Meadows protected.

CPRE agrees with them.

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

Attached documents:

Comment ID: PSLPS16/5977  Respondent: 8971233 / Tim J. Harrold  Agent:

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

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

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

OBJECTION TO SITE A35

Since I was born in Ockham and lived the early part of my life in Effingham I want to object at the enclosure of the Three Farms Meadows site in the Draft Guildford Local Plan:

The grounds for my objection are as follows:

1. The application for this site was refused by the GBC Planning Committee unanimously and therefore should not have been included in the GBC draft plan.

1. The village of Ockham should be protected against the overwhelming damage that will be done to it should this mixed use development be allowed to proceed.

1. There will be a loss of Green Belt agricultural land at the Three Farms Meadows site if this proposal goes further.

1. The increase of car traffic from this development will have a damaging effect on the congestion at Junction 10 of the A3 and the M25.
1. Air Pollution on the A3 and the M25 will increase if 2,000 more houses are built at the Three Farms Meadows site and their cars start to use the A3 and other local roads.

1. The site is a unique area of countryside with productive farming and is a home for a broad spectrum of wildlife, flora and fauna.

1. Transport links are inadequate and the two nearest stations are several miles away. Their car parks are already full by the end of the morning rush hour.

1. The site is unsustainable as there are no employment opportunities on Three Farms Meadows for the vast majority of the people when they move there.

1. The site is 300 acres in size of which 75% is open countryside with magnificent views in all directions.

Please will you make sure that this objection is recorded and take note of my objection.

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

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CPRÉ OBJECTION TO HORSLEY SITES A37, A38, A39, A40, & A41

CPRÉ objects to the proposal for six main development sites in the two attractive communities of East and West Horsley. Altogether these add up to more than some 535 new houses. Both villages are currently washed over by the Green Belt. The new development will be made possible by means of “insetting” which CPRÉ opposes in the draft Local Plan as it facilitates the growth of communities such as these which are together distinguished by their openness within a rural area. CPRÉ also objects to the extension of the settlement boundary south of the A246 and the progression of linear development towards Effingham and Ockham where the development of 2,000 houses is being proposed for the former Wisley airfield only some 2 miles away.

There are a range of constraints which have to be taken into account when reviewing these new proposals but have been ignored in the draft local plan. We are informed, for example, that Thames Water has advised GBC that the current wastewater network in this area is unlikely to be able to support the demand anticipated from all this ambitious and unexpected development growth. If this were to go ahead, the foul drainage system all the way to the treatment works North of Ripley will not be able to cope and would have to be upgraded through substantial investment.

The proposed expansion of housing on this scale will lead to major problems in terms of educational school provision. The following schools in the area are already operating at near or full capacity: Raleigh School, the Howard of Effingham School, and the private Glenesk and Cranmore Schools. It should be remembered that children in Ripley are currently having to be sent to schools in Shearwater in Woking and even to Addlestone.

Surrey County Council has published no plans for creating further school places for children of all ages for the Horsleys, or for the traffic management and environmental improvement scheme they have promised between 2019 and 2023.
CPRÉ objects to the volume of high density new housing proposed for the Horsleys which amounts to some 35% more homes because it will harm the character, identity, and setting of these villages. NPPF requires that new residential development must respect these elements of the community environment which will be entirely lost by building on the scale envisaged and should be limited drastically to take account of the infrastructure deficit.

The heritage buildings at Hatchlands belonging to the National Trust, and at West Horsley Place, where the new proposal for the Grange "Opera in the Woods" has been approved by GBC, must be protected against what appears likely to be unsustainable development which will overwhelm the local community environment for ever. West and East Horsley will be swamped with extra cars and people using the shops, stations, village halls, sports facilities, medical services, parking space and public transport. Paragraph 87 of the NPPF makes clear that inappropriate developments by definition harmful to the Green Belt and should not be approved except in very special circumstances. We do not agree with the draft Local Plan that this community should be a candidate for "insetting" to facilitate development on the scale suggested. We object to what is proposed and will oppose any suggestion that "exceptional circumstances" justify amending the Green Belt boundary in the way described at this draft Local Plan consultation as we consider this approach unsound. CPRÉ OBJECTION

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

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Comment ID: PSLPS16/3335  Respondent: 8971233 / Tim J. Harrold  Agent: 8971233 / Tim J. Harrold

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OBJECTION TO SITES RELATING TO POLICIES A43 & A43a : GARLICK 'S ARCH,SEND MARSH BURNT COMMON & RIPLEY

The proposal regarding Garlick's Arch was only submitted at a very late stage just before the consultation on the draft Local Plan began. It therefore needs to be considered under Regulation 18 rather than Regulation 19 rules.

It appears that an as yet unspecified developer has offered a new North facing slip road with access to the A3 in exchange for approval in principle to build atleast 400 homes and an industrial estate on Green Belt land adjacent to this strategic highway for which Highways England are responsible. CPRÉ considers that a greater degree of transparency is required for this proposal to be assessed properly. It would for example be valuable to know when and how this offer has materialised and whether it is linked in any way with any other current proposal being considered in this local ty in connection with the draft local plan.

It seems to us that this application has to be considered alongside several other development proposals which involve the A3 and depend on Highways Agency overview and agreement. These include the Wisley Airfield site (A35) for 2000 homes, which was unanimously refused by GBC at an earlier date before the draft local plan was available, the Gosden Hill site at Clandon/Burpham (A25) for 2,200 houses, the Slyfield Area Regeneration Project (A24) for 1,000 houses, and the Blackwell Fann site (A26) with A3 and A31 access at the Hogs Back for 1,800 homes. The common element to all these applications is that they depend on the input of the Highways Agency.

Additionally, we should bear in mind that the Royal Horticultural Gardens at Wisley, which is one of the largest tourist attractions in this part of England, have announced their plans to expand visitor attendance from 940,000 to 1,400,000 in the years ahead which will be a further A3 traffic consideration that needs to be addressed. Without clarification from the
Highways Agency as to how they intend to improve the traffic flow on the A3, which is already badly affected by peak hours congestion, and manage its various junctions with the M25, the B2251, the B2039, the A247, the A3100 and the A31 in particular, further assessment is premature.

Altogether over 7,000 houses are involved which seem certain to cause not only a crippling extra traffic burden for the A3 but also for our local road network.

It is not clear as yet how a 3 or 4 way on/off ramp at Burnt Common would work. It seems unlikely that it would alleviate traffic damage on a major scale for Clandon, Send or Ripley. CPRE therefore objects to this proposal which involves the loss of Green Belt to housing development, and is therefore directly against the Minister's statement that this would not be acceptable if local people were opposed to this and considered inappropriate. CPRE OBJECTION.

CPRE further argues that it would be premature to include this proposal in the draft local plan as the overall implications of what is being considered are insufficiently described.

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CPRE OBJECTION TO POLICY A46

LAND TO SOUTH OF NORMANDY & NORTH OF FLEXFORD 1. INTRODUCTION

As Policy A46 was only added to the draft Local Plan at a very late stage and without prior consultation or adequate evidence, CPRE believes that this whole topic should be subject to Regulation 18 rather than Regulation 19 consideration.

It appears that this late addition to the draft Local Plan was accepted as the result of Taylor Wimpey offering a new school for this mixed use development involving 1,100 houses. GBC seems to have acted opportunistically in accepting this proposal without assessing adequately beforehand how it would fit the policies that relate to the open countryside of the Green Belt.

CPRE has attended two packed public meetings since then at which the Guildford Borough and Surrey County Councillors spoke. At one meeting the local MP was also present. It appears that the whole community was totally taken by surprise at this proposed encroachment onto Green Belt countryside for which as residents they had received no advance warning.

CPRE has enjoyed good communication with the former Chair of the Parish Council and with members of the Normandy Action Group (NAG) over many years. We also have regular contact with the local Councillors concerned.

CPRE has established an additional link to the Friends of Normandy Wildlife since the draft Local Plan was published and have as a result become familiar with the issues which most concern them regarding biodiversity and ecology. We have also visited the proposed development area which is largely made up of Grade 3 agricultural land and some stretches of ancient woodland.
We have subsequently studied the submission that they have made which we consider thorough and professional. We have every confidence that the information in their submission can be considered as an accurate statement as to the current situation with regard to wildlife of all kinds in Normandy and Flexford.

The Treasurer of the Friends of Normandy Wildlife has also made a submission as an individual resident who is a member of CPRE which we have studied and fully endorse. CPRE agrees wholeheartedly with the views she has expressed which we consider accurately indicate that the proposal is unsound on the grounds listed later in this part of our submission.

1. ISSUES RELATING TO STRATEGY

The massive scale of this proposed development of 1,100 houses is unacceptable and inappropriate as it will encroach on the permanence of the Green Belt and damage the openness of the rural environment at this location by the introduction of high density urban sprawl. The Minister has made clear that housing demand is not sufficient grounds for altering the Green Belt boundary and therefore cannot be considered as "exceptional circumstances" justifying change in this context in the draft local plan. CPRE OBJECTION.

The site is overlooked from the South by the Hogs Back ridge which is located in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is also an Area of Great Landscape Value (AGLV). The Surrey Hills Management Plan to which GBC is a signatory states in Policy LU2 that "Development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views, tranquillity and light pollution."

Policy LUS states that "development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted." Natural England are to undertake a boundary review of the AONB at the Hogs Back to evaluate whether adjacent countryside can be rated as equivalent in quality to the AONB and therefore of national importance. This long standing strategy to which GBC has agreed should be observed and not obstructed.

Westwood (C16) and Glaziers (060) Lanes which will provide access to the site are the rural roads which enclose the proposed development area with the A323 and the railway line. The railway bridge on Westwood Lane reduces traffic flow to a single track. This infrastructure will in our view not be able to cope with the additional traffic which the proposed new development will cause. The draft Local Plan indicates that local highway environmental improvements (which are not specified) would mitigate the transport impact from the development, a statement which we find difficult to believe. However, the Strategic Highway Assessment Report carried out by Surrey County Council on behalf of GBC concludes that the Aldershot Road (A323) which already has little or no spare room for more vehicles at peak times would experience increased traffic congestion. Safety considerations from road accident history do not appear to have been taken into account. Because of development in the Aldershot area in Rushmoor, with more planned for the future, the A323 has had to take steadily increasing traffic as vehicles seek to find a way through to Guildford and the A3. There appears to be no joined-up thinking as to the impact of the proposed Nonnandy/Flexford development on this deteriorating situation. Proposals regarding more passenger use of the unmanned Wanborough station are over optimistic since passengers wishing to reach London have to change at Guildford. The station can only accommodate a maximum train length of 4 carriages. Access to adequate parking at the station is not at present available.

The sewerage system appears to be already running at capacity and could not cope with the proposed development. Footnote 9 for NPPF policy 14 indicates that development in locations at risk of flooding such as at Normandy/Flexford should be restricted.

The community is not convinced that there is a demand for a secondary school in this part of Guildford. An analysis of vacancies at schools in the Hogs Back area indicates that there is current spare capacity. There appears to be a strategy being promoted in the development sector that building a school in this and other development areas will enable a boundary review to be agreed for the Green Belt on the grounds of "exceptional circumstances". CPRE rejects this idea which it finds fundamentally unsound. CPRE OBJECTION.

The proposal does not clarify which comes first: the extra housing, the new school, the shops, or the infrastructure. It is a chicken or egg story. It appears that GBC has agreed to remove the Normandy/Flexford proposal from the draft local plan should it be shown that the school is not required. CPRE maintains that this development proposal should not have been submitted in the first place and is in conflict with GBC strategy in many areas. It should be removed from the draft Local Plan.
Policy H1 Homes for All

We consider that this policy should have a sub heading such as:

"The most efficient use of existing urban and previously developed land".

Development of brownfield sites is the first priority. We also will need to look at the vexed question of higher density whilst having regard to existing character not only in Guildford but also other sustainable locations such as Ash and Tongham. This extra emphasis is necessary in order to lessen the need for the consideration of open land whether within the Green Belt or the countryside.

We must use all the urban land that is available for housing efficiently. We need to look for previously developed land which is no longer required for business or other employment purposes. One important priority is to identify whether there is a backlog of sites in Guildford Borough, for which planning permission has already been granted but not yet been developed. In the past, a great deal of windfall development has contributed towards our planning targets. CPRE sees no reason why this should not be the pattern for the future as well. Many older buildings survive which are still named after their former use. We believe that change will result in individual sites becoming available with the closure for example of small businesses such as local newsagents, post offices, builders yards, and pubs. We would therefore question whether the estimate made in Policy S2 of 625 dwellings from 2018 to 2033 is accurate and sufficient, bearing in mind past rates of achievement in this category. Every effort should be made to include a realistic figure for windfalls which in the past has proved such a valuable element of the housing provision.

It is important that the University of Surrey meets its commitment to build the multi occupancy student housing on its two campuses that it has promised in the past. CPRE maintains that from now on 100% of new student accommodation should be provided on the University of Surrey's two campuses, both of which have sufficient space to replace sections of surface parking for this purpose. We object to the figure of only 60% of existing students being accommodated on Stag Hill and Manor Park. We consider that the figure should be higher and the policy wording with its use of the words "we expect" strengthened. This would reduce the problem of students using leased housing for multi occupancy in the town that otherwise would be available for year round use by young families with working parents.

The policy does not indicate the density of housing within urban Guildford which should be the objective for future building. Clearly, this is a sensitive issue which will be affected by a wide range of factors including conservation areas, height and design. All surface parking sites should be carefully assessed to evaluate whether more multi storey facilities or underground parking could be considered which use precious space better. We are aware of many individual garages in rear gardens with access to a road which are neither attractive in appearance nor fulfilling an efficient use of land which could be built on. We object that the Policy does not include a density figure, or range, for new housing within the urban area of Guildford, Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt surely it is...
time to be pragmatic and realistic by specifying higher densities for building where this can be done without harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for Independent older people that wish to downsize from their current residential accommodation.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required. CPRE objects to the excessive amount of retail proposed in the town centre on land which could be regenerated with housing.

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

Attached documents:

Comment ID: PSLPP16/7314  Respondent: 8971233 / Tim J. Harrold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

POLICY H2 Affordable homes

Defining exactly what is meant by the word “affordable” is as difficult as asking for a definition of “sustainable”. It is hard to believe that 80% of the market value of a house in Guildford would fit this definition and be considered affordable. We do not think that the extensive glossary definition provided will be valid for long, given the Government’s constant tinkering with this difficult area with its tax and other incentives. We also have difficulty with the enthusiasm in political circles for the “right to buy” concept which we believe will eventually have to be reconsidered.

Developers generally prefer to make more money by building larger mansions which bring in more profit for them than affordable home initiatives. The demand for new housing in this county is almost limitless so the impact of what is proposed in the draft Local Plan will not in our opinion have any effect on house price levels.

We support the proposals made for affordable housing being required for sites of 5 or more houses or sites of 0.17 hectares or more regardless of the number of homes involved. We also agree 40% of these homes should be affordable. We agree with the policy which requires for 70% of the affordable homes supplied to be for rent. We wonder how far these objectives will be achievable.

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

Attached documents:

Comment ID: PSLPP16/7315  Respondent: 8971233 / Tim J. Harrold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

POLICY H3 Rural Exception homes

There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which we believe should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

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

Attached documents:

Comment ID: PSLPP16/7306  Respondent: 8971233 / Tim J. Harrold  Agent:

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

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

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

1. Infrastructure

CPRE objects at the failure to supply a satisfactory infrastructure strategy or delivery plan for Guildford in time for this consultation. In the Surrey Infrastructure Study of January 2016 the total infrastructure cost required was assessed to reach £1.162 billion. The total secured funding was given as £75.8 million and the total expected funding was estimated at £568.2 million. This left a funding gap of £518 million which is equivalent to 55% of the total costs budget. CPRE OBJECTION.

CPRE recognises that many major infrastructure decisions affecting Guildford District are outside the control of GBC and that this makes planning ahead for a long period almost impossible, especially at a time when the economic outlook is so uncertain and difficult to predict. Many decisions which can only be outlined as aspirations depend on infrastructure provision being agreed by Highways England (M25 and A3), Historic England, Natural England, Network Rail, the Surrey County Council, and Thames Water. The constraint of providing SANGS in connection with the Thames Basin Heaths has also to be taken into account.

GBC are making ambitious proposals for housing regardless of the lack of adequate infrastructure in support. Without this being provided before development is begun, there will we believe be a real threat of intensified disruption caused by traffic congestion, particularly at peak times, in many communities. CPRE OBJECTION.

Surrey's motorways already carry 80% more traffic than the average for the South East and our A roads 66% more than the national average. CPRE has been heavily concerned with traffic management issues across the county for many years. We have served on the M25 Orbit Committee and were involved with the consultation on the Hindhead tunnel, the Cobham Motorway Service Area and the Hard Shoulder Running Initiative for the M25 between Junctions 5 and 7. We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. We expect to become involved in monitoring the North Downs rail proposal linking Reading to Gatwick via Guildford.
We think it unrealistic for Cross Rail 2 to be discussed at this continuing time of likely austerity as a means of freeing up
the overburdened rail line to Waterloo from Guildford and Woking. We do have, however, to recognise the planning
challenge that the high percentage of commuters travelling to London for work represents, together with a comparable
number coming into both Guildford and Woking for daily employment. Its disheartening to see the inadequacy of the
Solum proposal for Guildford's mainline station which did not sufficiently address the issues that concern commuters or
residents most. CPRE OBJECTION.

The detrimental impact of traffic congestion on quality of life across Surrey is a topic of importance to everyone. The
location of schools and their school runs are of course a daily cause of traffic problems. The proposal for the Hoe Valley
school and its associated leisure and sporting facilities will be on Green Belt land and will certainly not improve matters on
the A320 at Mayford on the road between Guildford and Woking, even if Paragraph 89 of the NPPF allows for greater
flexibility to be shown for outdoor sport and recreation within the Green Belt, as long as it does not conflict with its
openness. The Woking Traffic Survey acknowledges that this proposed development will have a damaging effect on
congestion on the A320 and A322 as well as other local roads. CPRE OBJECTION.

Congestion on A roads leads to the overuse of B roads by speeding traffic that exceeds the relevant limits which are
invariably not enforced. The B367 from Ripley to Pyrford is an example of this problem. Speed limits for the Pyrford
Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the
road itself, as at Newark lane in Ripley, slows traffic down.

Other roads such as the B380 serve as a link between the A324, the A322 and the A320 and all carry excessive traffic for
their size. An example of a C road which is already under severe traffic pressure is Salt Box Road which forms the link
between the A320 and the A322 as well as funneling through traffic between the M3 and the A3. Burdenshot and Goose
Rye Road are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon
station which is located within Woking Borough, where a new Park and Ride location is proposed. The question has to be
asked in this context as to how this proposal can be considered given the Kemishford bridge access problem and the
unsuitability of the bridge near the station at Prey Heath Road within the history of flooding issues.

CPRE gives these examples of busy roads where house building on the scale envisaged for Guildford and Woking will only
make traffic matters much worse. Further analysis is required in both boroughs of the impact of the huge housing projects
proposed and the positioning of the school and park and ride facilities they envisage. CPRE OBJECTION.

CPRE questions whether all the development envisaged for Guildford can be considered sustainable and deliverable in the
time required. Paying for all this investment will be very hard to achieve through the Community Infrastructure Levy (CIL)
which is one of the motivating forces behind GBC's attempt to accelerate passage of the draft Local Plan and use as much
Green Belt land in the process as they can. CPRE again maintains that this approach is misguided as it places too much
emphasis on economic priorities at the expense of environmental policies which have served the community well and need
to be supported rather than undermined. CPRE OBJECTION.

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

Attached documents:

Comment ID: PSLPP16/7316  Respondent: 8971233 / Tim J. Harrold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV)

The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to reinforce its special landscape qualities and protect it from development. All such proposals will be assessed against the provisions of the current Surrey Hills AONB Management Plan.

There will be a presumption against major development in the AONB. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or to the distinctive character of the AGLV itself.

Reasoned Justification

- Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. Any and all development proposals within and adjacent to the AONB will be expected to conserve and enhance its special qualities.

- Paragraph 116 states that planning permission should be refused for major developments in these designated areas unless exceptional circumstances are justified.

- No change will be made to AGLV status pending completion by Natural England of its review of the AONB boundary. The role that the AGLV plays in protecting this nationally important countryside should then be confirmed and its importance in maintaining landscape character and quality recognised both within and outside the AONB.

- The policies outlined in the Surrey Hills AONB Management plan apply not only to Guildford but to all relevant districts and boroughs across the county. This document is a key tool in the decision-making process regarding AONB and AGLV countryside. The management plan is also an important material consideration in determining planning applications within and adjacent to the AONB.

"POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and of Great Landscape Value (AGLV)

- The Surrey Hills AONB is countryside of national importance and has equal statutory protection to a National Park. The whole of the AONB is classified as an Area of Great Landscape Value (AGLV) and this extends beyond the AONB boundary with the objective of protecting its distinctive landscape character. AONBs were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape.

- The Surrey Hills offers some of the most beautiful and accessible countryside in England. The North Downs National Trail runs along their length and is characterised by its important views across distinctive landscape which includes chalk grassland, woodland, heaths, commons and agricultural land. An important objective of planning is to conserve and enhance the natural setting of the AONB and to protect its unspoilt character and tranquility.

- Dark skies at night and the lack of air pollution and noise disturbance are for example a feature of the Surrey Hills countryside at the Devil's Punchbowl near Hindhead since the A3 tunnel with its traffic has gone underground. Protecting a sense of remoteness and natural beauty in the landscape should be reinforced in all parts of the Surrey Hills AONB within Guildford.

- Natural England are scheduled to make a review of the AONB boundary with the intention of extending the size of the Surrey Hills. While the AGLV has acted as a buffer to the AONB, it also has its own inherent landscape quality, which contributes to the rural environment in its own right and preserves views from and into the AONB. It should continue to provide long standing protection across the county to important countryside and is to be considered equivalent in quality to the AONB.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)
The Surrey Hills AONB is countryside of national importance and should therefore be provided with the highest level of protection. The draft policy needs to be strengthened so that it includes a more robust defence of natural beauty which must be conserved and enhanced.

We have decided to express our objection to Policy P1 by suggesting the following alternative wording which we believe would be more readily acceptable:

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

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/7298</th>
<th>Respondent:</th>
<th>8971233 / Tim J. Harrold</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. **Introduction**

CPRE Surrey Guildford District welcomes this opportunity to make this submission concerning the draft local plan. CPRE has the third largest county membership in the country and Guildford and Waverley are its two biggest CPRE Districts in Surrey. CPRE is an Advisory Board Member of the Surrey Hills AONB Partnership and also chairs the Surrey Aviation Group. On both a national and local scale, CPRE has had extensive experience over many years in shaping and interpreting planning policy.

1. **Background to this Submission**

CPRE is concerned at the uncertain background to this GBC consultation which has been characterised by a number of executive and officer changes and also overshadowed by the recent EU referendum with its as yet unpredictable political and economic outcome. It is not possible, for example, at this time to estimate what impact this might have on inward migration. We are dismayed about the inclusion in the draft Local Plan of so many Green Belt development sites which are considered necessary by GBC if they are to meet the unrealistic 'Objectively Assessed Need' (OAN) figure of 693 houses per annum (SHMA). What is required instead is a more careful consideration of the many widespread and serious constraints on development within the Borough, and the need to protect and enhance the countryside adjacent to and around the town of Guildford and its villages, rather than undermining this valued resource through the proposal of urban extensions and over large housing sites.

CPRE does not agree that this consultation should be made under Regulation 19 as a number of wholly new items, which we have indicated in this document, have not been consulted upon under Regulation 18. Additionally, many proposals for policy and development sites have not been able to be assessed fully for consultation as the necessary detail for them is absent.

Furthermore, some of the 'evidence' in the Pegasus Report on the countryside has not been corrected, and has been used in a subjective quality assessment of the Green Belt to justify recommendations for changing boundaries that do not stand up to detailed examination. We have given an example of this in connection with the Blackwell Farm proposal (page 17).

CPRE has had to select only those sections of the draft Local Plan for comment which are primarily concerned with the countryside as the 6 week period for consultation is too short a time to deal with all the material available for study. We
have therefore had to concentrate on those omissions and assumptions made about the borough that we consider need to be reviewed more completely in depth.

1. Fundamental Overall Objection

(i) Green Belt and AONB

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

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

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

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

Attached documents:
The draft Guildford Local Plan is in conflict with this list of the five purposes of the Green Belt, and also seeks to challenge the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open. CPRE OBJECTION.

Paragraph 14 makes clear that "the presumption in favour of sustainable development" is to be limited where "specific policies in the framework indicate development should be restricted". These policies are listed in Footnote 9 to Paragraph 14 and include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Areas of Outstanding Natural Beauty, Local Green Space, designated heritage sites and locations at risk of flooding. All of these categories apply to the Guildford District. Constraints should be taken into account in the Housing Need Figure (OAN) and the figure of the Housing Target in the draft Local Plan lowered accordingly.

Paragraph 83 states that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan" which is of course the process with which we are now concerned. CPRE maintains that "exceptional circumstances" is a far stronger requirement than the "very special circumstances" referred to in Paragraphs 87 and 88 when considering regular planning applications as to whether they are appropriate or not. The definition of "exceptional" is much more specific and relates to rare occasions which are outside normal policy planning process. "Exceptional circumstances" have to be regarded as not the norm. They are to be characterised as unique and permanent, and the opposite of required general practice which is concerned with planning interpretation and implementation for specific applications. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed.

It follows that a boundary review of the Green Belt is a unique and rare occurrence which is "exceptional". The draft Local Plan, however, seeks to make numerous boundary reviews of the Green Belt in many different Guildford borough locations at one time, which clearly infringes the permanence rule which applies to the Green Belt designation. Moreover, the Guildford Borough Local Plan which was adopted in January 2003 agreed to a major change in the Green Belt boundary when the University of Guildford Manor Park campus was permitted. It is clear to us that it was not intended that any further changes to this permanent boundary would be allowed a few years later at a subsequent Local Plan. We maintain that this renders the proposed draft Plan unsound because it follows an incorrect policy approach.

CPRE OBJECTION.

We also do not accept the arbitrary way in which the Pegasus Study has concluded that Green Belt sites which fulfil only 2 of their 4 "purpose assessment tests" are categorised as only of "medium sensitivity" and therefore available for possible development should they meet other policy requirements. This is a fundamentally flawed policy approach which is designed to accelerate erosion of the Green Belt in a totally unacceptable manner for the purposes of housing development and will result in urban sprawl encroaching onto open countryside.

CPRE OBJECTION.

CPRE is additionally concerned about how Paragraph 85 of the NPPF should be interpreted with its reference to "defining boundaries" and "safeguarded land between the urban area and the Green Belt". We support the concept of villages being "washed over" by the Green Belt as part of the approach to be followed in Guildford but it is our impression that the term "safeguarded" is rather the opposite of its normal dictionary definition when it comes to the long term permanent protection of the Green Belt. Nor do we agree with the use of "insetting" in sensitive locations such as at Mount Browne and the University of Law in Artington PC which are within both the Green Belt and the Surrey Hills AONB, or its use in a policy change which will effectively remove 14 villages from any real Green Belt protection. It is important that Local PCs can reach decisions regarding the openness of their village communities rather than have to accept a centralised judgement on this issue. This extra element in influencing local decision-making is undesirable. CPRE OBJECTION.

Guildford has a Parish Council heritage with a well informed knowledge of the countryside in its local areas. We believe that as the Minister states "local people" will and should be making decisions about the numerous changes proposed in the draft Guildford Plan as regards the settlement boundaries in their communities and not being advised of this "from a distance" which avoids the use of fully informed local input. Changes as well to conservation area boundaries are a sensitive matter.
that needs careful local attention. Elsewhere in this document, we have referred in addition to the interpretation of draft Policy H3 regarding Rural Exception Homes which we find not tightly defined sufficiently.

It is important that Guildford and its neighbouring communities do not merge into one another through the steady erosion of the Green Belt in the way proposed in the draft Local Plan now under consultation. They should rather be encouraged and seek to retain their separate character, identity and setting. It is essential that these elements of planning are recognised and supported by GBC rather than allowed to be undermined bit by bit. The green gaps between villages should be retained and not succumb to linear "ribbon" development along roads and railways. The green approaches to Guildford's villages, such as for example Effingham, should be protected so that they remain as far as still possible distinct from their neighbouring communities at Bookham and East Horsley. CPRE objects to the way in which Guildford also is in danger through its draft Local Plan of merging into neighbouring towns such as Godalming. The constant unbalanced emphasis on economic growth will harm the countryside that so many residents and visitors value and cherish. CPRE OBJECTION.

CPRE objects to the continued reliance on the "evidence" in the Pegasus Report for the new draft Local Plan which was shown to be inaccurate in many aspects during an earlier consultation process to which the public expressed their objection in large numbers. We deplore the way in which value judgements made for this discredited report - which has not been changed - are being used for the "traffic light, evaluation of 4 of the 5 Green Belt purposes listed above. We object to this method of approach using these often misinformed evaluations which define the sensitivity value of the Green Belt into the 3 categories of Red, Yellow and Green. This is an unacceptable basis upon which to justify a wide range of Green Belt boundary revisions which cannot be considered adequate for the draft Local Plan with its "exceptional circumstances" requirement. It deliberately ignores the NPPF policy which emphasises the importance of the Metropolitan Green Belt and its permanent nature. The policy also makes clear that its boundaries are designated to prevent urban sprawl by protecting openness. The boundaries of the Green Belt were established for this purpose and are as valid now as they were when first introduced. They were not intended to be altered by an onslaught of changes each time a Local Plan was brought forward for consideration. CPRE therefore objects most strongly to this proposal and believes that the draft Local Plan has to be considered unsound on these grounds. "Exceptional circumstances" by their definition do not encompass a multiplicity of changes along the lines envisaged. CPRE OBJECTION.

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

Attached documents:
I feel that this is an insufficient explanation of what is happening. There is no adequate description for example as to the decision process whereby some villages continue to be “washed over” with Green Belt and some not. Nor is it apparent how such a major change can be introduced arbitrarily in this way when NPPF clearly indicates that the characteristics of the Green Belt are its permanence and its openness. We know that NPPF policy states that changes to a Green Belt boundary have to be made at the time of a consultation on a Local Plan and will only be justified in exceptional circumstances. What is not clear is whether so many changes can be justified at one time and whether legitimate “exceptional circumstances” apply on the grounds that the Green Belt is preventing inappropriate development. Surely, this is exactly what it is supposed to be doing. What we are being asked to accept is that because some parts of a village have been built-up in the past then this should be allowed to extend onto additional open areas of the village settlement which Green Belt policy maintains should be kept open.

The Introduction to Policy P2 states in paragraph 4.3.13 on page 48 that:

“The following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village”.

In addition paragraph 4.3.15 lists a number of major previously developed sites which are also to be inset from the Green Belt which include the two nationally important AONB sites at Mount Browne and the University of Law, a decision which is subject to objection by Artington PC and CPRE.

Paragraph 4.3.17 also refers to the fact that land at the former Wisley Airfield has been inset as well and will therefore be removed from the Green Belt. CPRE has lodged an overall objection to this development which we consider falls into a totally different category as a strategic site.

It seems apparent that insetting is being used in a number of different areas to change Green Belt boundaries in villages, urban locations, strategic sites and major existing developments such as the Henley Business Park, HM Prison at Send, Pirbright Barracks and the Pirbright Institute.

The way in which this topic has been announced hardly suggests that this is still a matter for consultation as we are told that Regulation 19 now applies. However, we maintain that there has been insufficient transparency on this matter because of how the draft Local Plan has been edited, and that clarity of presentation on this new policy has not been handled adequately.

CPRE has had to spend some time finding the relevant policy references and considers that they are not clearly laid out for easy comprehension as one would normally expect for a policy change of considerable impact and importance. This is a major issue as the failure to clarify the policy in one place in the draft Local Plan will serve to deter investigation and/or understanding by those communities most involved owing to the difficulty of locating all the relevant text concerned.

Surprisingly, one has to turn to paragraph 4.5.50 in Policy D4 on page 106 to obtain further information relating to insetting and the policy which is to be followed in this context in urban and inset village areas. This states that 15 villages are to be affected.

A provisional decision has apparently been made that these villages do not qualify in terms of openness to remain in the Green Belt. This will mean that the Green Belt boundary will have to be amended in no less than 15 communities. However, it is unclear if or when this issue was discussed with Parish Councils and how far Local People in the villages concerned have been involved in the consideration of this decision. Furthermore, so many changes to the Green Belt boundary at one time hardly qualify to be justifiable under “exceptional circumstances” since 15 different individual sites are involved. We also question whether “openness” should be the only consideration to take into account when Green Belt has no less than five other purposes that ought to be met.

It is our concern that the justification for removing villages from being washed over by the Green Belt boils down to a desire to increase development which would formally have been considered “inappropriate” because other unspecified development management policies will apply that are less effective and robust. We are not convinced that many of the villages concerned would welcome this approach. If this proposal were to go ahead, it has been reported that no less than 105 kilometres of new Green Belt boundary would be involved.
We also have serious reservations as to whether these proposed changes stand up to closer examination. We assume that this proposal is based on the “evidence” given in the revised version of volume 4 of the Pegasus Green Belt & Countryside Study upon which we are reluctant to place much weight. We do not have confidence in the “evidence” that this document contains. We also note that an attempt is being made to increase the settlement boundaries of several villages without clarifying clearly what is being done.

So let us have a look at a few examples of what is proposed.

I know Effingham well and am familiar with its Conservation Area and the open land at the King George V playing fields, Browns Field, Effingham Golf Club, Effingham Lodge Farm and Effingham Common. All of these areas are distinguished by their openness as is the land beyond the Little Bookham boundary adjacent to Manor House School. Land to the South of Effingham also includes open countryside. I am not clear whether it is acceptable for Guildford to make changes in the Green Belt at Effingham without first advising Mole Valley Council of what they intend to do just over the borough boundary. It is a community which is already in danger of merging with the villages of Little Bookham and East Horsley through linear development along the A246 and the Lower Road. Surely, we do not wish to weaken the protection afforded by the “washed” over Green Belt provision in the circumstances we have described.

It is easy to point out the openness of the villages of Flexford/Normandy, and the Horsleys as they are today. The problem relates to the inappropriate development that is proposed in the draft Local Plan which is determined to force through what we consider incipient urban sprawl in these communities and transform their current rural environment. This will require an extensive boundary review for the Green Belt to take place so that they can absorb more housing. CPRE has already objected to this elsewhere with respect to these sites. The draft Local Plan is not acceptable because it is seeking to undermine the long established implementation of successful Green Belt policy.

Moreover, we are aware of numerous amendments which have been surreptitiously made to settlement boundaries in order to facilitate further building development for the draft Local Plan. We do not consider that these changes have been made in such a manner that they will be immediately understood by the public because they are not easily “transparent” in the information available.

It seems to us that the draft Local Plan as it stands is unsound because it is based on too high an “Objectively Assessed Need” (OAN) figure for housing, a refusal to deduct constraints, and it consciously seeks to undermine the Green Belt to facilitate the unrealistic achievement of reaching this target. CPRE believes in the value of the Green Belt which it is determined to defend and accordingly adds this objection to the others it has submitted already. We consider that what we have discussed in this letter and the other submissions we have made amounts quite simply to bad planning.

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

Attached documents:

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<th>Comment ID: PSLPP16/7324</th>
<th>Respondent: 8971233 / Tim J. Harrold</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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POLICY P3 Countryside

CPRE supports the need for a policy that protects countryside outside the Green Belt from development and greater physical and/or visual coalescence between settlements. We also recommend an additional introductory sentence calling for "the landscape character of the countryside outside the areas covered in Policy P2 to be protected and enhanced, and any new development to be designed and sited to minimise any adverse impact on this character". This phrasing has been successfully used in another district plan in Surrey to cover the same issue. It is suggested that the policy wording to be used might usefully be discussed with Waverley, if this has not already been done, as they have a far larger area of "land beyond the Green Belt" to consider than Guildford.

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

Attached documents:

Comment ID: PSLPP16/7327  Respondent: 8971233 / Tim J. Harrold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

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

POLICY P4 Flooding, flood risk and groundwater source production

CPRE is regularly in communication with the National Trust with regard to the Wey Navigation and with CPRE Kent where we have access to expertise on the topic of water supply. We hope that the Brexit decision will not reduce EU input to this sector. CPRE is concerned about the pattern of increased flooding over recent years which seems to be linked with climate change.

It appears that storm severity is a factor in increasing water run-off which is partially due to housing growth. It appears to us that many areas of Guildford Borough are being increasingly affected by flooding and that reduced maintenance of rural roads has added to local problems in this context. It is anticipated that should building on the Green Belt countryside proceed as envisaged in the draft Local Plan, flooding problems will increase and the Environment Agency and Thames Water will be put under more intense pressure as they attempt to tackle major infrastructure problems relating to flooding, water supply and sewage issues. This increased activity will start at a moment when manpower cuts at these key organisations in this area are being implemented.

At the same time, the Environment Agency has warned much of Surrey that the balance of water supply and demand is "seriously stressed". It is important, therefore, that aquifers are not used excessively for water irrigation purposes for the 140 golf courses in the county. Many of the major Guildford housing developments could be affected by water supply problems such as occurred when the National Trust heritage building of Clandon House was burnt down. The scale of housing projects outlined for the years ahead could certainly present a problem in this context.

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

Attached documents:

Comment ID: PSLPP16/7331  Respondent: 8971233 / Tim J. Harrold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

POLICY P5 Thames Basin Heath Special Protection Area

It is a serious mistake that GBC has not taken this constraint into account when arriving at its OAN housing figure.

CPRE has reservations as to how this policy is working but sees little prospect of any change being introduced as its wording does not really fall within local authority control. The principal difficulty is to do with the system of SANGs that has been developed and the way this is being implemented by GBC and other neighbouring districts. Many SPA sites are still being visited by dog walkers in large numbers even when SANGs are supplied, and if these are located near SPA boundaries, damage is quickly done to any ancient woodland and good agricultural land bordering the protection area such as at Blackwell Farm. We have viewed the income generated in Guildford for SANGs at Chantry Woods in the AONB and the Registered Common at Effingham. Greater transparency is required as to how this money is to be spent and where.

A key application is to be heard at Worplesdon on 20th July after a long delay as something of a test case at which a proposed SANG application will be consulted upon in the Planning Committee.

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

Attached documents:

Comment ID: PSLPP16/7307  Respondent: 8971233 / Tim J. Harrold  Agent: 

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

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

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

Policy S1: Presumption in favour of sustainable development

CPRE finds the wording of this strategic policy inadequate. There is no attempt to define what the word "sustainable" means. It does not provide guidance as to how the conflicting requirements of economic, social and environmental conditions can be balanced or met. All the emphasis is given to the need for planning decisions to be flexible, adaptable to rapid change, and positive to development. The existing wording adds little more of importance than what is already contained in the NPPF. We consider a major omission is that there is no reference to the Green Belt or to its importance. There is no indication that a whole chapter in the NPPF is concerned with protecting Green Belt land. There is a failure to explain Paragraph 14 on page 4 with its important footnotes which relate to the specific policies in the NPPF which "Indicate development should be restricted" and that prompt decision-taking should be made "unless material considerations indicate otherwise". There is no reference to Paragraph 115 on page 26 which includes the statement that "the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring assessment under the Birds or Habitats Directives, is being considered, planned or determined". Guildford surely needs to recognise this strategic policy in view of its close proximity to the Thames Basin Heaths.
The policies referred to in Footnote 9 on page 4 of the NPPF are all highly relevant to Guildford Borough and should therefore be given prominence. They need to be clearly referenced in this important Strategic Policy so that their relevance and significance is acknowledged and properly recognised. So many planning decisions in our borough have to be concerned with the Thames Basin Heaths SPA, SSSIs, the Surrey Hills AONB, the Green Belt, Local Green Space, heritage assets and locations at risk of flooding. We are critical of the way in which these constraints have been handled in the preparation of the draft plan. They need to be clearly spelt out from the outset for all to see.

It is surprising that the strategic issue of infrastructure provision of all types has not been more adequately covered. The extensive proposals for building on the Green Belt will be unsustainable without further input from Highways England and Network Rail. CPRE OBJECTION.

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

Attached documents:

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**Comment ID:** PSLPP16/7299  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

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

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

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

Town Centre Capacity

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

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

Attached documents:

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**Comment ID:** PSLPP16/7311  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S.2 Borough Wide Strategy

It is difficult for anyone to predict at this stage what the impact of the Brexit decision will be. What we do know is that most of Guildford should be highly protected from development thanks to long established planning policies such as the Green Belt which are defined and understood by the general public as permanent. It appears that this is not the intention in the draft Local Plan. 44% of the nationally important countryside within the Surrey Hills AONB lies within the Green Belt and about 75% of the area of the borough is further protected by the Thames Basin Heath SPA. Other land such as Registered Commons and Ancient Woodland are also not available for development.

CPRE objects to a draft local plan which calls for an increase in the number of residential dwellings by a quarter. This requirement for a housing figure of 13,860 dwellings is based on the West Surrey Strategic Housing Market Assessment (SHMA) prepared by GL Heam for GBC which is shown to be flawed. Green Balance has prepared for CPRE a review of this document for Guildford, Waverley and Woking Districts which maintains that the annual housing figure upon which the Borough Wide Strategy is based for Guildford is far too high. This renders the whole Local Plan for the District unsound.

GBC has not been able to prepare in time an acceptable plan for the Town Centre and the urban area of Guildford, causing undue emphasis to be switched to building on Green Belt countryside around the town. It is in our view unreasonable to embark on a radical transformation of the borough on the basis of an uncertain housing target which may well prove increasingly unreliable. CPRE OBJECTION.

It is in our view essential to reconsider the proposals made regarding the priority given to retail and office development, which we believe to be overstated, rather than to housing at an appropriate density on brownfield sites in the town. We question the allowance for the provision of other business employment land such as warehouses. It seems to us that retailing is undergoing a transformation illustrated by the loss of Austin Reid and BHS, the incursion of Aldi, M&S foodshops at rail and petrol stations, and on line purchasing and delivery of all kinds.

We maintain that the gap town of Guildford is a "special case" and should be recognised as such from a planning viewpoint because of its widely protected countryside which should be an ongoing constraint on development and preclude major structural change along the lines proposed. We feel obliged to emphasise again the permanence of the Green Belt, the Surrey Hills AONB and the SPA in this district. CPRE OBJECTION.

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

Attached documents:

Comment ID: PSLPP16/7340  Respondent:  8971233 / Tim J. Harrold  Agent:

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

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

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

IN CONCLUSION

The following information appears on the web site dated June 7th 2016 of Brandon Lewis MP, the Minister of State for Housing and Planning:

"Many people contact me about development on the Green Belt, particularly when it is on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes
through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development. National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development. Planning Policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces from caravan and traveller sites.

In view of this informal statement of national policy, we should like to see GBC reconsider the draft Local Plan that is now under consultation which undermines and erodes the Green Belt in Guildford Borough extensively. CPRE has major objections to the way in which Green Belt policy is being ignored by GBC using the "Objectively Assessed Need" figure for housing of 693 houses per annum as a justification for their recommendations. We object to this approach since we believe it is linked to evidence that is flawed as indicated by Green Balance and other specialists in this field.

The web site goes on to state that "latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989." This is an achievement which underlines the permanence of the Green Belt policy in stark contrast to what is proposed for Guildford. CPRE therefore objects strongly to the draft GBC Local Plan which it finds to be unsound.

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

Attached documents:

Comment ID: SQLP16/1106  Respondent: 8971233 / Tim J. Harrold  Agent:

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

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

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

1. Duty to Cooperate

In the past CPRE has been very aware of the requirement for local authorities to demonstrate evidence of having cooperated to plan for issues with cross boundary impacts (NPPF 181). Now NPPF includes a chapter dealing with 'Planning strategically across local boundaries' on page 42 and GBC has followed this up with a Topic Paper on 'Duty to Cooperate' which explores the implications of this strategy. Sections in the Topic Paper under the headings "Enterprise M LEP" and "Meeting Needs" raise a number of issues about the newly established Strategic Economic Plan (SEP) and the choice of Guildford as one of four growth towns which are considered to be key to driving economic expansion across the Enterprise M3 area. As part of preparing the draft Local Plan, GBC has had regard to the SEP by seeking to meet both identified housing and employment needs. The emphasis on a "Sci:Tech Corridor" has also encouraged a focus on research, development and design activities and the provision of valuable knowledge-based employment. This in turn led to the proposed "allocation" of Blackwell Farm, which is owned by the University of Surrey, to be partly used as an extension to the Surrey Research Park and for 1,800 houses to be built on Green Belt land in a mixed use development. CPRE has objected to this proposal in its response to Policy A26 on page 17 of this submission. Policy E4 gives further details of the aspirational development concerned.

Little or no account is taken when making the Blackwell Heath proposal of the permanence of the Green Belt, the national importance of the AONB countryside, the problems of traffic congestion, and the lack of adequate infrastructure to provide easy access by either train to a new Guildford West station, or by road to and from the A31 on the Hogs Back. No consideration is given either as regards whether there is really a need to expand the Research Park onto Green Belt land in view of the very low density of buildings on this site, and the generous space allowed for surface parking. Surely, the
provision of multi storey and/or underground parking should be given priority so that more space is made available for building this on the Research Park, the other two University campuses and at the Hospital.

(i) Wider Implications on Meeting Needs

The NPPF now requires that local plans meet objectively assessed needs, and where possible any unmet needs from neighbouring authorities as well where it is reasonable to do so and consistent with achieving sustainable development (NPPF 182).

Although Woking has indicated that it will have a substantial unmet need for housing, GBC has stated that Guildford Borough cannot assist them. Nonetheless CPRE is concerned that this new strategic policy approach suggests that the requirements of the economy are being given an unbalanced cross boundary ascendency over well established environmental policies that are needed to protect the Green Belt and the Surrey Hills AONB at Guildford. This would seem to be influencing GBC planning in its adoption of the unusually high housing target of 693 from the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) whose recommendations are being questioned as flawed in the enclosed Green Balance review.

We find the draft Local Plan unrealistic not only because of its over ambitious onslaught on Green Belt policy but also because of the £3 billion shortfall in infrastructure backlog across the county which is recorded in the Surrey Infrastructure Study dated January 2016. This backlog has to include infrastructure issues relating to roads, rail, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution, and a range of other environmental and social considerations.

An example of a cross boundary impact includes the proposed development at Cranleigh and Dunsfold in Waverley which is clearly unsustainable and will cause major congestion problems all along the A281 to Guildford and will affect communities such as Bramley, Chilworth, Shalford, Shamley Green, and Wonersh as well as adding to the severe congestion in Guildford town centre and the junctions of the A3 serving the town. CPRE OBJECTION.

Proposals for development of the North Downs rail line will affect AONB countryside in a number of districts and will need to involve the Surrey Hills AONB Partnership. A range of issues concerning rights of way, level crossings, bridge infrastructure, stations, footpath crossing safety and passenger service will need consultation. The protection and enhancement of nationally important countryside will be a major consideration.

The River Wey Navigation requires that the National Trust is consulted across district boundaries. Agreement is needed not only with Natural England concerning water quality standards but also how the flood plain is protected and not harmed by the proposed housing development in relevant boroughs. The effect of run-off from new building sites and of climate change has to be considered as a priority.

The emphasis on school provision is a repeated feature of the draft local plan in connection with new site proposals within the Green Belt. This has led CPRE to review catchment areas for schools (and the associated road traffic problems) near the borough's boundaries with Mole Valley, Waverley, and Woking. Communities such as Effingham, Leatherhead, Mayford, Ripley and Sheerwater are all affected. The planning for schools on new sites seems to be linked with the flawed concept that this is a means of obtaining Green Belt boundary revision as they represent "exceptional circumstances". CPRE OBJECTION.

Another current problem relates to the fact that Surrey is already the most overflown county in England and aviation noise disturbance is increasing within the Surrey Hills AONB due to the number of active airports around the county and this affects Guildford. In addition to Gatwick and Heathrow, for which no runway expansion decision appears likely before mid October at the earliest, we refer in particular to proposals for expansion at Biggin Hill, City, and Farnborough. The CAA absolves itself from control of low flying movement below 4,000 feet as this is considered an LPA responsibility. The noise implications of Farnborough's controlled airspace proposal affects all landing and take-off flight paths in the surrounding area. CAA policies have endorsed the concept of narrower flight paths until recently, and this resulted in severe noise implications for some communities, and harmed the remote character and tranquility of nationally important countryside. The plans for Farnborough are also of particular concern as they will affect the use of the largest centre for gliding in the country at Lasham. Growth in aviation activity at these airports, whether for passengers or freight, will also lead to yet more road congestion. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/270  Respondent: 8971233 / Tim J. Harrold  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: pslp172/2730  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

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

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

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

Policy A39: Land near Horsley Railway Station, Ockham Road North, East Horsley

The Site is included in the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017) as a draft allocation (Site Allocation A39 – Land near Horsley Railway Station, Ockham Road North, East Horsley) for approximately 100 dwellings. We welcome and support the Site’s removal from the Green Belt and its identification as a Site Allocation for approximately 100 dwellings. As set out in our response to Policy P2 below, the Site does not serve any of the five purposes of the Green Belt identified in paragraph 80 of the Framework. Furthermore, the Site is highly
sustainable and is a logical solution in delivering much needed housing. Overall it is considered important for the Council to retain the Site’s allocation to ensure that the Borough’s housing needs can be met.

Part of the changes made to the Proposed Submission Local Plan: Strategy and Sites (2017), Draft Policy A39 identifies a requirement for this site allocation for approximately 100 homes to include some self-build and custom housing plots. As set out in our response to Policy H1 below, we support the principle of the requirement for self-build and custom housebuilding on sites providing 100 homes or more. We however object to a requirement to provide some self-build and custom house building plots on this site if less than 100 homes are delivered. We suggest the wording of the policy is amended to require some self-build and custom housing plots on this site for a scheme comprising 100 homes or more. If less than 100 homes are provided on this site the policy should not require any some self-build and custom housing plots. We consider this is a reasonable approach that would be consistent with Policy H1.

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

Attached documents:

Comment ID: pslp171/1201  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

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

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

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

Policy D4 (Character and Design of New Development)
A series of design criteria have been added to Policy D4 which states that high quality design is expected in the Borough. Catesby support the Council’s ambitions to ensure that all development in the Borough is of a high quality design. Paragraph 56 of the Framework attaches great importance to the design of the built environment and states that good design is a key aspect of sustainable development, is indivisible from planning, and should contribute positively to making places better for people. Following on from this, paragraph 58 states local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Catesby recognise the value and importance of good design and welcome the additional text in Policy D4.

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

Attached documents:

Comment ID: pslp171/1196  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H1 (Homes for All)

A requirement for accessible homes has been added to Policy H1 which states that on residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard ‘accessible and adaptable dwelling’ and 5% of new homes will be required to meet Building Regulations M4(3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable. The Planning Practice Guidance (PPG) states that local planning authorities setting additional technical requirements exceeding the minimum standards required by Building Regulations, will need to gather evidence to determine whether there is a need for additional standards in their area (Paragraph: 002 Reference ID: 56-002-20160519). The PPG also states that ‘local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment’ (Paragraph: 003 Reference ID: 56-003-20150327). Furthermore, the PPG highlights:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations”. (Paragraph: 007 Reference ID: 56-007-20150327)

It is therefore considered that this addition to Policy H1 is not justified and is not supported.

A requirement for self-build and custom housebuilding has also been added to Policy H1. Policy H1 states that self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more, 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. Policy H1 further states that self-build plots made available must respond to the sizes identified on the register. Policy H1 also states that plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months. The supporting text of Policy H1 highlights that where plots have been available at market value and marketed appropriately for at least 18 months and have not sold, the plot(s) may remain on the open market as self-build or be built by the developer. The supporting text also states that higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots.

We acknowledge that the Council has a requirement to deliver a wide choice of accommodation. Whilst we agree to the principle of the requirement for self-build and custom housebuilding, we have some concerns in relation to the implementation of the policy. We consider the timescales of marketing plots for 18 months is too long. We consider that a period of 12 months would be more reasonable and consistent with the National requirement to speed up delivery of new homes.

We welcome the Council’s approach that plots can be built by the developer if they have not sold after the marketing period.

We consider that Policy H1 needs further clarity on whether the mix of dwellings will be taken into account when calculating if 5% of the plots need to be self-build and custom housebuilding. We note the supporting text identifies that higher density residential sites for flatted development would be unsuitable for self-build and custom housebuilding, however we are concerned how Policy H1 could be applied to a site of 100 homes that includes a mix of both houses and flats such as Site Allocation Policy A39). We consider that the Council needs to be more specific regarding the scenarios in which this policy will apply. We suggest that flats are excluded from the calculation for the threshold where the 100 homes trigger would apply.

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

Attached documents:

Comment ID: pslp171/1197  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

As set out in our representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016), we would still question the percentage of affordable housing proposed in which could render sits unviable and undeliverable. Policy H2 states ‘we will also seek affordable homes on sites providing five or more homes, or sites of 0.17 hectares or more regardless of the number of homes. We will seek at least 40 per cent of the homes on these sites as affordable homes’.

As set out in our previous representations, the viability of residential developments is an important factor that should be taken into consideration when determining the level of affordable housing provision set out in a Local Plan. This matter is strongly supported at paragraph 173 of the Framework which states:

“To ensure viability, the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable development to be deliverable”.

In the context of paragraph 173, we would question the requirement of at least 40% of affordable housing. We also consider that Policy H2 needs further clarity to identify if self-build and custom housebuilding plots will be taken into consideration when calculating the requirement for affordable housing.

The changes to Policy H2 now allows for affordable housing contributions to be provided off-site, or by payment in lieu where the Council agrees that on site provision and management would be impracticable due to size and/or location and this is welcomed.

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

Attached documents:

Comment ID: pslp171/1202  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

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

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

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

Policy ID1 (Infrastructure and Delivery)
Several changes have been made to Policy ID1 following the consultation in June 2016 on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016). However we maintain that Policy ID1 should make reference to the tests set out at paragraph 204 of the Framework to ensure that obligations meet the following tests:
• Necessary to make the development acceptable in planning terms;
• Directly related to the development; and
• Fairly and reasonably related in scale and kind to the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P4 (Flooding, Flood Risk and Groundwater Protection Zones)
No significant changes have been made to Policy P4 in the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017) following the 2016 consultation. As identified in our previous representations, the Environment Agency Strategic flood mapping indicates that the Site may be affected by flooding. Catesby Estates Limited are already engaged in detailed discussions with the Environment Agency (EA) regarding the Site and have undertaken modelling which confirms that the extent of flood zones 2 and 3 within the Site are far less than those shown on the EA’s current map. The majority of the Site lies outside the floodplain and is located in Flood Zone 1 (Low Probability – land assessed as having a less than 1 in 1,000 annual probability of flooding from rivers and sea). Catesby have submitted the final, modelled, floodplain information in the format required for the flood map to be updated. The EA will then complete final internal and external checking before starting to change the Flood Map itself, this includes determining how the new mapping ties are inserted into the existing mapping to ensure a smooth transition between data.

Notwithstanding the low probability of flooding at the Site, any new development will benefit from a flood mitigation strategy which will include setting finished floor levels for new dwellings with a suitable freeboard and providing a safe access route, even in the event of flooding elsewhere.

A surface water management strategy will also be implemented to manage surface water runoff in a sustainable manner, with key features potentially providing areas of ecological and amenity value as well as restricting the discharge into the watercourse. The provision of a sustainable drainage system as part of the residential development will ensure that the impact of development upon the local surface water drainage network can provide betterment to existing greenfield run-off rates. The proposed development will not result in increased flood risk on site or elsewhere in accordance with Policy P4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Policy S2 (Planning for the Borough – Our Spatial Development Strategy)
Draft Policy S2 identifies that during the plan period of 2015-2034 the Council will make provision for at least 12,426 new homes (654 dwellings per annum). We note that this housing number has decreased from 13,860 new homes outlined in the Proposed Submission Local Plan: Strategy and Sites (2016). The Land Availability Assessment (LAA) Addendum (2017) indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dwellings per annum to 654 dwellings per annum.

We are aware of the representations submitted by the House Builders Federation to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017). Accordingly, we would encourage the Council to provide a robust evidence base and ensure sufficient and deliverable housing land is being provided over the plan period in order for the Local Plan to be found sound.

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

Attached documents:

Comment ID: pslp17q/227  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin Gallagher)

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

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

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

REPRESENTATIONS TO THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES (JULY 2017) (REGULATION 19) CONSULTATION
THE MALTHOUSE (NORTH OF THE RAILWAY), LAND WEST OF OCKHAM ROAD NORTH, EAST HORSLEY

We are instructed by Catesby Estates Limited to submit representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, in relation to their interests at The Malthouse (North of Horsley Railway), Land West of Ockham Road North, East Horsley (‘the Site’ hereafter). The Site is shown outlined in red on Drawing LOC/001. Please also find enclosed a Vision Framework that was submitted with our previous representations to the consultation in July 2016 for the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016).

The Proposed Submission Local Plan: Strategy and Sites (2017) sets out the vision for the Borough and the Council’s approach to development between 2015 and 2034. The Council previously consulted on the Proposed Submission Local Plan: Strategy and Sites (June 2016) in June and July 2016. As a result of consultation work in 2016 the Council have proposed a number of changes to the Proposed Submission Plan: Strategy and Sites (2017).

As stated above, we commented on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016). We have also previously commented on the Local Plan Issues and Options Consultation in November 2013, the Draft Strategic Housing Market Assessment (SHMA) in February 2014 and the Draft Local Plan Consultation in September 2014.
We welcome the opportunity to review the Proposed Submission Local Plan: Strategy and Sites (2017) and wish to ensure that the Plan is found sound in accordance with the Framework, and therefore provide the following comments.

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

Attached documents:

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**Comment ID:** pslp17q/228  **Respondent:** 8971745 / Catesby Estates Limited  **Agent:** Barton Willmore (Gavin Gallagher)

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

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

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

**Summary**

Catesby Estates Limited support the aims and ambitions of the Plan and wish to ensure that the Plan is found sound.

We welcome the Site’s removal from Green Belt and its identification as a Site Allocation within the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017). It is imperative that the Council retains this allocation to ensure that the objectively assessed needs for the Borough are met and unmet needs of the HMA.

The Site is sustainable, well contained and has no technical constraints to its delivery and does not serve any of the purposes of the Green Belt identified as paragraph 80 of the Framework.

If you require any further information or wish to discuss the above in greater detail, then please do not hesitate to contact Jessica Evans or myself.

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

Attached documents:

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**Comment ID:** PSLPS16/2120  **Respondent:** 8972321 / D Coghill  **Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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

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

Attached documents:

Comment ID: pslp172/329  Respondent: 8972417 / Andrew Halliday  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: pslp172/285  Respondent: 8973025 / Jean Parr  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/4258  Respondent: 8973377 / Cassidy Slyfield Ltd. (Cassidy Slyfield Ltd)  Agent: Nathaniel Lichfield & Partners (Steven Butterworth)

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

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

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

Guildford Proposed Submission Local Plan: Strategy and Sites - Regulation 19 Consultation

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

Nathaniel Lichfield & Partners (NLP) has been instructed by Cassidy Slyfield Ltd (‘our client’) to submit a representation on the above draft Proposed Submission Local Plan.

We do so on behalf of our client and Mr & Mrs Mostyn, who each own part of the proposed site located immediately to the north of the Slyfield Industrial Estate (SIE) (i.e. former site allocation 63 in the consultation draft Local Plan, July 2014). They are jointly promoting the removal of the site from the Green Belt to enable the expansion of the SIE.

These representations are in response to what we believe is a wrongful and unsound decision by the Council to remove an allocation for employment land in the draft Proposed Submission Local Plan. We urge the Council to reinstate this allocation prior to submitting the draft Local Plan for Examination and provide the reasons for doing so here.

Local Plan Examination

Our client and Mr and Mrs Mostyn (and their professional advisors) reserve the right to attend the Local Plan Examination. We would welcome the opportunity to participate, so as to contribute to the discussion of the Inspector’s questions arising from our and other relevant representations for the soundness of the employment allocations in the Plan and the robustness of the evidence base underpinning it.

The North Slyfield Site

The 4ha site (‘North Slyfield Site’) is owned by (1) Cassidy Slyfield Ltd and (2) Mr and Mrs Mostyn, local Jacobs Well residents (see attached plan, Annex 1).
It adjoins Slyfield Industrial Estate (SIE) and also Slyfield Area Regeneration Project (SARP). It is currently unused scrub land with a public footpath running along the northern and eastern boundaries linking Jacobs Well with SIE.

It is an excellent option for extending the Borough’s premier industrial estate which is in high demand and has no real capacity to expand through intensification.

Allocation History

The Draft Local Plan: Strategy and Sites (July 2014) took the North Slyfield Site out of the Green Belt and allocated it as a sustainable extension to the industrial estate for “light industrial (B1c) and / or general industrial (B2) and / or storage and distribution (B8)” uses (Site 63). The allocation is in Annex 2.

This was a sound, evidence-based allocation which should have been carried forward in the Submission version of the draft Local Plan in order to contribute towards meeting the need for additional employment land in the most sustainable and appropriate, strategic location.

In response to the Council’s consultations, there were very few negative representations to the allocation and a number of responses in support, including from the Guildford Society (see below).

Our client was very surprised that the Council has now changed its mind and instead is recommending reliance on employment allocations in the contentious strategic Green Belt sites at Wisley Airfield in Ockham and Garlick’s Arch in Send Marsh / Burntcommon. The stated reasons for the Council volte-face are that:

- there has been a reduction in the amount of additional employment land that is required since 2014; and
- “the site was not identified [for development] in the Green Belt and Countryside Study and is located within high sensitivity Green Belt”[1].

Previous Representations Submitted on Behalf of Cassidy Slyfield Ltd and Mr and Mrs Mostyn

Our client has previously submitted the following documents in support of removal of the North Slyfield Site from the Green Belt and its allocation for employment purposes:

1 Representations in response to Issues and Options consultation on Draft Local Plan Strategy and Sites, submitted by email and post (29 November 2013). These documents, which make both the case for removal of the North Slyfield Site from the Green Belt and allocation for employment purposes, comprise:
   - Planning Assessment, including Landscape and Visual Appraisal and completed Local Plan Strategy and Sites Issues and Options Questionnaire (Annex 3)
   - Executive Summary (Annex 4).


3 Letter dated 18 January 2016 responding to the public and stakeholder representations on the North Slyfield Site (Site 63) received by the Council following its July 2014 consultation in respect of the Draft Local Plan (Annex 6).

4 Letters and photographs to Councillors dated 6 and 24 May 2016 (Annex 7).

5 Briefing Note provided to all GBC Councillors in advance of the 11 May Executive Committee Meeting (Annex 8).

We attach further copies of these documents (for Officers’ convenience and to assist the Inspector’s consideration).

Outline of the Case for Employment Allocation of the North Slyfield Site and its Removal from the Green Belt

The case for the North Slyfield Site to be re-allocated for employment purposes and removed from the Green Belt can be summarised as:
Employment Reasons for Allocation
1 There is a quantitative need to allocate additional employment land in the Borough.
2 There is a qualitative need to provide additional employment land adjacent to SIE, Guildford’s premier industrial / warehousing location.
3 The North Slyfield Site would be more easily delivered than the other employment allocations.
4 The allocation of the North Slyfield Site would positively support other Council strategies.

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

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

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

There is a quantitative need to allocate additional employment land in the Borough

As you will be aware, NLP is an acknowledged expert and market leader in the field of preparing and assessing employment land reviews across the UK, and is engaged in this capacity by numerous local planning authorities. NLP’s expert Economics team has reviewed the Council’s Employment Land Needs Assessment (ELNA) (2015) and associated documents in order to advise in respect of the Council’s assertion that there has been a reduction in the amount of additional employment land that is required in Guildford since the North Slyfield Site was allocated in the Draft Local Plan two years ago in July 2014. In particular, NLP has reviewed the methodology used in the ELNA to assess future employment land requirements in Guildford to consider whether it represents a robust approach.

The ELNA estimates there is a requirement for between 4.7 ha and 5.3 ha of industrial and storage land in Guildford during the period 2015 to 2033 (i.e. a maximum of only 0.3 ha of land each year over the life of the Plan). This has been adopted by the Council as the industrial allocation in Policy E1 (Sustainable Employment) of the Proposed Submission Local Plan to support industrial job growth during the plan period.

Assuming a plot ratio of 0.45 for industrial and storage land as used in the ELNA, this industrial requirement would enable the delivery of a maximum of only 23,850 sq.m of industrial and storage floorspace over the plan period, equivalent to 1,325 sq.m of floorspace per annum.

NLP’s review of the ELNA considered whether the methodology used in the study suitably meets the guidance for Housing and Economic Development Needs Assessments (ID: 2a) outlined in the Planning Practice Guidance (PPG). Overall, the methodology used in the ELNA was considered to largely meet the guidance set out in the PPG although some limitations to the study were identified which reduce the soundness of the requirements estimated for Guildford. These are: 1) reliance on historic trends to estimate future requirements and 2) limited consideration of local business and market conditions and needs to inform the future requirements.

The requirement for industrial and storage land in Guildford estimated in the ELNA was based on the assumption that recent trends of floorspace and job growth will continue into the future. This means if industrial job growth has outstripped industrial floorspace growth historically, this trend is assumed to continue through the plan period 2015 to 2033. In this context, the ELNA indicates that industrial job growth has outstripped industrial floorspace growth in the Property Market Area (PMA) for Guildford over recent years. This means that the amount of new floorspace that was estimated to be required to support the forecast growth in industrial jobs in Guildford was also at a lower rate, in order to reflect past trends, which contributed to the small requirement for industrial and storage land identified in the ELNA.

This trend of industrial job growth outstripping industrial floorspace growth was assumed in the ELNA to simply reflect that the current industrial floorspace in the Guildford PMA was being more effectively used, with this trend of increasing employment densities assumed to continue into the future. However, we assert that the lower industrial floorspace growth
compared to industrial job growth in the Guildford PMA is just as likely to reflect that the delivery of new floorspace is highly inelastic compared to the creation of new jobs.

This means that the lower industrial floorspace growth compared to industrial job growth in the Guildford PMA is unlikely to reflect lower demand or need for industrial floorspace, but rather the difficulties of delivering new industrial floorspace to the market (e.g. due to land constraints or limited site opportunities). In fact, the ELNA supports the view that industrial floorspace growth in Guildford has not been at a high enough level over recent years to keep up with demand in the local market, stating the following in Paragraph 5.4.6:

“Consultations with property market experts suggested that the current supply of industrial and storage premises is not meeting existing demand. There is a lack of available sites and these sites tend not to deliver the quality and type of space occupiers need.”

If recent growth in the supply of industrial floorspace in Guildford is assessed to have not been high enough to meet demand in the local market, it is therefore reasonable to assume that the use of historic trends to estimate future requirements is not a sound methodology. This is therefore the key limitation of the methodology used in the ELNA, as it estimates a small industrial and storage requirement that reflects a historic under-supply of floorspace in Guildford. We consider that planning for such a small industrial land requirement in the new Local Plan would continue to under-supply the market and constrain the growth potential of businesses, which represents an unsound approach to positively planning for growth in Guildford.

In fact, the ELNA also recognises the possibility that demand for industrial land in Guildford is actually higher than the estimated requirements in the study. This is due to the supply of floorspace being highly rigid and unable to reflect increases in demand over the short term, with the ELNA stating the following in Paragraph 7.2.5:

“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years.”

This small industrial land requirement is not sound as it is not positively planning for growth in Guildford. This is particularly so in the context of the upper range requirement estimated in the ELNA (i.e. 5.3 ha of industrial and storage land) being 40% lower than the requirement estimated in the previous Employment Land Assessment (ELA) published in 2013 (i.e. 9 ha over the period 2013 to 2031) and 60% lower than the requirement estimated in the Council’s unpublished ELA prepared in 2014 (i.e. 13.9 ha over the period 2013 to 2031).

In this context, it is useful to consider the potential reasons why the requirement for industrial land in Guildford is said to have declined so substantially between the ELA (2013) and ELNA (2015). We note the ELNA included very limited consideration of underlying economic and market factors in Guildford when estimating the forecast industrial requirements. This contrasts with the ELA which did include some consideration of conditions in the Borough, which we believe improves the validity of these forecast requirements and better reflects national guidance in the PPG in terms of considering recent market signals when estimating future needs. Such underlying economic and market factors taken into account by the ELA includes prevailing gaps in the local market (e.g. the need for move-on premises and new, good quality premises), needs of local businesses in regards to the type of space they require to support their growth plans, and the future economic growth aspirations of the Council.

Taking these factors into consideration, the ELA estimates there will be an increase in demand of between 4 ha and 9 ha for industrial and storage land over the period 2013 to 2031. This forecast industrial requirement takes into account the fact there has been very limited supply of industrial premises in the Borough over recent periods, which is likely to have constrained business growth in the local market, as well as the fact the Council needs to “support innovation, new business and growth in all sectors and ensure we help the borough’s economy to diversify” [paragraph 4.3.9]. In addition, the risk associated with not delivering enough industrial space in Guildford is identified in Paragraph 4.3.10 of the ELA, stating that by not planning for an “increase in B2 floor space, we may discourage businesses from locating in the borough and may prevent existing businesses from expanding.”
Overall, we believe the approach used in the ELNA to estimate the forecast industrial and storage land requirement for Guildford has inherent shortcomings, which reduce the soundness of the forecast requirements carried forward in to the Proposed Examination Local Plan. This is highlighted by the surprising disparity in the range of the requirements estimated over the past three years. The amount of industrial and storage land that should be planned for in the new Local Plan should be higher than the currently proposed requirement, in order to take into account underlying economic and market factors in the Borough that have not suitably been taken into account in the ELNA.

The failure to positively prepare to provide adequate employment land is also unsound because it is inconsistent with NPPF national policies to: contribute to building a strong and competitive economy [paragraph 7]; support growth and innovation [paragraph 7]; pro-actively meet the development needs of Guildford [paragraphs 14 and 20]; and pro-actively drive and support sustainable economic development to deliver the business and industrial units the country needs [paragraph 17].

The NPPF is crystal clear that “The Government is committed to ensuring the planning system does everything it can to support sustainable economic growth” [paragraph 19, our emphasis]. In failing to provide adequate employment land allocations, the Proposed Submission Local Plan clearly fails to do “everything it can” and is therefore unsound.

**There is a qualitative need to provide additional employment land adjacent to SIE. Guildford’s premier industrial / warehousing location**

In addition to this need for additional employment land across the Borough as a whole, there is a strong and urgent need to positively plan for additional employment land at SIE in the short term to ensure the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses. The failure to positively plan for expansion of the SIE also means that the Proposed Submission Local Plan is unsound.

The 2015 ELNA identifies a clear shortage of available employment land in the Borough to meet forecast requirements over the plan period, meaning new employment sites need to be designated to help stimulate future growth in the economy.

The recent ELNA refers to the Guildford Business Survey (undertaken in two phases in November 2014 and July 2015). That survey indicated that around one-third of businesses surveyed in the Borough were actively considering relocating, mostly within the Borough. Of particular note from this survey was the desire of businesses to relocate close to their current location with survey results showing that “industrial occupiers stated a preference for locating in Slyfield or a similar mid-urban industrial estate location”2.

This evidence base used by the Council to inform the preparation of the Proposed Submission Local Plan therefore points towards a strong need to positively plan for new employment sites in the Borough during the plan period that are suitable for meeting the existing and forecast demand for new employment space, with SIE identified in this evidence base as being a preferred location for industrial firms in terms of supporting their future relocation and growth plans.

However, the ELNA indicated that SIE currently has as little as 185sq.m of vacant industrial space, and limited prospects for intensification or additional space at the estate3. This premier industrial location in the Borough is therefore effectively operating at full capacity and has almost no potential to support future growth in the local economy as it presently stands.

In this context, the North Slyfield Site represents the only location that can enable sustainable industrial / storage growth at the premier industrial estate in the short term. While some light industrial (B1c) and ‘trade counter’ uses are allocated as part of the Slyfield Area Regeneration Project (SARP) to the east of SIE, this would not meet the requirements of industrial / storage businesses and operators. In addition, importantly, the Council’s own assessment identifies significant constraints to developing SARP. It is therefore unknown when SARP as a whole, and allocated Class B1(c) light industrial uses in particular, would come forward for development, but it certainly would not be expected to come forward during the short term (e.g. relocation of the sewage treatment plant alone is expected to take four years).

In the absence of additional employment land at SIE to enable the business community to grow organically, it can be expected the growth potential of SIE would remain constrained in the foreseeable future. Given the importance of the premier industrial location in the Borough, it can also be expected that such constraints will have a negative effect on the economic growth potential of the local economy as a whole.
The Proposed Submission Local Plan is therefore unsound because it fails to positively and pro-actively plan for economic growth as required by the NPPF, particularly at the strategic location in the Borough where there is most demand (i.e. “in the right place and at the right time” as required by the NPPF [paragraph 7].

**The North Slyfield Site would be more easily delivered than the other employment allocations**

It should be noted that, whilst Officers recommend allocations for industrial and storage uses at other strategic Green Belt sites in the Proposed Submission Local Plan (eg. Wisley Airfield and Garlick’s Arch – the latter literally added at the last hour4), these potential sites are likely to have greater risks in terms of take-up compared to the North Slyfield Site, given that they cannot draw on the market value of an established strategic industrial location. In fact the industrial / storage uses allocated at each of these sites (as well as the light industrial uses at SARP) form part of larger mixed-use developments with deliverability issues and which could also create compatibility issues between the housing and industrial uses supported at these sites, particularly in relation to heavier industrial activities. In contrast, the North Slyfield Site adjoins existing industrial activities and is set some distance and shielded from residents at Jacobs Well.

Further, the North Slyfield Site was the only industrial / storage allocation made by the Council that supported the industrial market in the Guildford Urban Area.

Again, the failure to allocate industrial / storage land “in the right place and at the right time” means that the Proposed Submission Local Plan is unsound.

**The allocation of the North Slyfield Site would positively support other Council strategies**

An employment allocation on the North Slyfield Site would support a range of other growth strategies and initiatives currently being brought forward by the Council.

As stated above, SIE is identified, in the ELNA, to be a preferred location for industrial businesses in terms of supporting their future relocation and growth plans. The allocation of the North Slyfield Site could therefore re-accommodate growing businesses in the Borough that want to be situated in Guildford Urban Area, which in some cases could release previously developed employment sites in urban areas for housing development. In their representations on the July 2014 Draft Local Plan, the Guildford Society supported allocation of the North Slyfield Site, partly because it could accommodate businesses displaced at town centre / housing allocations including those at Walnut Tree Close (allocations A5, A9, A10, A13 and A14, currently in use as builders merchants, industrial and warehousing).

The release of urban sites for new housing provision supports the Guildford Town Centre Vision (2014), which seeks to grow the provision of housing in the town centre. In addition, the support for new housing development at urban sites could help to ease pressure on releasing Green Belt land in the Borough to accommodate the required housing delivery.

Further, an employment allocation at the North Slyfield Site has the potential to help unlock SARP by relocating some of the existing or proposed industrial / storage / light industrial uses at SARP to the extended SIE. This would allow a greater proportion of housing to be delivered in SARP, and would ultimately boost the potential development value of the project.

In addition, the growth of the strategic industrial estate through this allocation would reinforce the case for bringing forward the proposed Clay Lane Link Road, as the allocation would underline the Council’s priority of supporting economic development at the premier industrial location in the Borough and the related need to improve the estate’s access to the wider strategic road network.

For these reasons the Proposed Submission Local Plan has not been positively prepared and is therefore inconsistent with the NPPF.

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

The North Slyfield Site was not specifically assessed in the Council’s Green Belt and Countryside Study (2013), but formed 10% of a very large parcel of land referenced Land Parcel B3 (LP B3). LP B3 is too large (covering a bigger area than SIE) and varied in quality for any meaningful consideration to be given to the Green Belt boundaries around Jacobs Well and SIE. It includes within it a number of environmentally sensitive areas (i.e. River Wey floodplain, registered common land, SSSI, SPA, SAC and LNR); none of which apply to the North Slyfield Site. As a consequence, when LP B3
was reviewed against four of the Green Belt purposes, it was scored to fulfil all four purposes and judged to be of ‘high Green Belt sensitivity’.

When our initial 29 November 2013 representations (Annex 3) were received by the Council, Officers recommended and Members agreed that the North Slyfield Site should be taken out of the Green Belt and allocated for employment use in the Draft Local Plan (July 2014 consultation version). At that time, the Council agreed with our assessment of the employment, Green Belt and landscape issues. However, we consider that it would have been prudent if the North Slyfield Site had been formally assessed at that time, as a smaller Potential Development Area (PDA) (as many other sites have been, including those in high sensitivity Land Parcels B16, D2, D6, D10, E9, F3, H7, H8 and J7). Had the Council done so, the North Slyfield Site would have been found to be suitable for removal from the Green Belt and employment allocation via the application of the GBCS methodology for assessing:

- Stage 2: the degree to which the land contributes to the purposes for the Green Belt (see below).
- Stage 3: the sustainability credentials of the land.
- Stage 4: the environmental capacity of the land to accommodate appropriate development.

NLP’s Planning Assessment submitted to the Council on 29 November 2013 reviews the North Slyfield Site and concludes that it performs well against these stages.

The Planning Assessment also provides a more detailed review of the North Slyfield Site’s development against the NPPF’s five purposes of Green Belt land and finds that it complies. In summary:

Jacobs Well and Guildford would remain physically and visually separate; and there would be no reduction in the existing minimum separation distance between them.

Development could be contained behind existing substantial boundary planting which, with limited enhancements, would screen new development in public views and maintain the visual gap.

Defensible boundaries prevent any further northward expansion of SIE and safeguard the countryside from further encroachment.

No impact on the character and appearance or setting of a historic town or conservation area.

Additional employment floorspace would assist urban regeneration of the SIE by strengthening its offer, role and attraction to businesses; and improve viability of SARP.

In addition, relocations of new or growing businesses on to an expanded SIE could release poorer quality brownfield sites for housing, which would relieve Green Belt pressures elsewhere.

The full Green Belt and landscape case is set out in NLP’s Planning Assessment and Landscape and Visual Appraisal reports submitted to the Council on 29 November 2013 (Annex 3). We suggest these should be thoroughly reviewed again before the Submission Local Plan is finalised and sent to the Planning Inspectorate.

Green Belt Comparisons

The GBCS reviews land parcels against four of the NPPF Green Belt purposes and scores them. The following table extracts the GBCS scores and commentaries for the large LP B3 (within which the North Slyfield Site sits) and also those for Wisley Airfield (LP C18) and Garlick’s Arch (LP B14). LP B3 gets a high score of 4; however, the North Slyfield Site within it scores lower than any of the LPs and should be prioritised because it performs better than the other sites in terms of the purposes of the Green Belt (as well as being in a location where there is existing demand and a need to expand the strategic employment site at SIE).

<see attachments for table 1>

The GBCS study methodology is not robust when applied to the assessment of the North Slyfield Site. As noted above, in the GBCS LP B3 gets a high score of 4. However, we consider that this is erroneous. It should not receive a point for NPPF Green Belt purpose 4 – which is “to preserve the setting and special character of historic towns”. The fundamental
The purpose of Green Belt policy is to prevent urban sprawl by keeping land permanently open. However, the GBCS gives LP B3 one point because it “preserves setting of River Wey conservation area”, which is not a historic town. This is wrong and LP B3 should score no more than 3 points, the same as LP B14 within which the allocated Garlick’s Arch site sits. This erroneous methodology undermines the Local Plan evidence base and is another factor contributing to the employment allocations within the Proposed Submission Local Plan being unsound.

Removal of the North Slyfield Site from the Green Belt would not harm the Green Belt, landscape quality or views and should be included in the Submission Local Plan consistent with national policies for the Green Belt as well as economic growth.

<see attached documents for appendix>

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

Attached documents: 13719 Proposed Submission Local Plan (Reg 19) Consultation Rep 18.07.16.PDF (8.3 MB)

Comment ID: PSLPS16/7904  Respondent: 8973377 / Cassidy Slyfield Ltd. (Cassidy Slyfield Ltd)  Agent: Nathaniel Lichfield & Partners (Steven Butterworth)

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

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

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

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

The draft Proposed Submission Local Plan allocations for industrial / storage uses set out a number of considerations for each site, and these are directly quoted from the Plan in the table below. From this, it is clear that the North Slyfield Site has fewer constraints on development (and is therefore more deliverable) than the Submission Local Plan allocations. Please also note, as set out above, that the North Slyfield Site would be much more attractive to the market because it adjoins the existing premier industrial estate in Guildford and therefore benefits from existing infrastructure, business linkages and economies of scale.

<see attachments for table 2>
There are also a number of other reasons why the North Slyfield Site is a better option for additional employment floorspace and should be prioritised, with the allocation reinstated. The full case for prioritising the North Slyfield Site can be summarised as follows:

**SARP**

1. The North Slyfield Site could meet the needs of a full range of Class B1c, B2 and B8 operators whereas the employment allocation at SARP is for Class B1c light industrial only.

2. The undeveloped parts of SARP share landscape characteristics with the North Slyfield Site and qualitatively there is little difference between them. However, SARP is closer to the River Wey and sensitive landscape and nature designations, and could therefore be said to be more sensitive.

3. The North Slyfield Site could be delivered now and within a five year time frame. While SARP is a good option for additional light industrial floorspace, relocation of the sewage treatment plant and County depot and viability issues has hindered the scheme to date.

4. Employment allocation of the North Slyfield Site could help unlock SARP by relocating some of the existing or proposed light industrial uses at SARP to the extended SIE. This would allow more housing to be delivered at SARP and boost development value. In addition, the growth of SIE through this allocation would reinforce the case for bringing forward the proposed Clay Lane Link Road – another important Council aspiration.

**Wisley Airfield, Ockham**

This mixed-use allocation includes approximately 2,500 sq.m of B2 (industrial) and B8 (warehouse) floorspace, requiring 0.7 ha of land to build out.

1. The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the small employment allocation at Wisley would not, and could not meet the needs of existing businesses wishing to expand or relocate within the urban area or to Guildford’s premier industrial location.

2. The North Slyfield Site is unconstrained by built and natural heritage and environmental constraints, unlike Wisley.

3. The North Slyfield Site benefits from existing natural boundary screening which would lessen the impacts of built development on the Green Belt / surrounding countryside; Wisley has no screening.

4. The North Slyfield Site is currently unused scrub; much of the Wisley allocation is currently farmed.

5. The North Slyfield Site could be delivered now and within a five year timeframe; there are question marks over the delivery of Wisley and a mixed use scheme was recently refused planning permission by the Council.

**Garlick’s Arch, Send Marsh / Burntcommon**

This mixed-use allocation includes approximately 7,000 sq.m of B1(c) (light industrial), B2 (industrial) and B8 (warehouse) floorspace, requiring 1.75 ha of land to build out.

1. The North Slyfield Site benefits from existing commercial infrastructure, linkages to other businesses and economies of scale; the employment allocation at Garlick’s Arch could not meet the needs of existing businesses wishing to expand or relocate to Guildford’s premier industrial location or within the urban area.

2. The North Slyfield Site is set some distance from the houses on Jacobs Well Road and the existing boundary planting would attenuate noise; Burnt Oak is much closer to the residential properties to the north west of Burntcommon Lane and Portsmouth Road (B2215), and to the north east of Kiln Lane.

3. The North Slyfield Site is currently unused scrub; much of the Garlick’s Arch land is currently farmed.
Again, the failure to allocate employment land “in the right place and at the right time” (as required by the NPPF) means that the Proposed Submission Local Plan has not been positively prepared, is ineffective and therefore unsound in this respect.

**The allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders**

In response to the July 2014 draft Local Plan consultation, the Council received a very small number of representations in respect of removing the North Slyfield Site from the Green Belt and allocating it for employment purposes.

Ten responses either supported the allocation or did not object. Notably, this included support from the Guildford Society which backed the allocation particularly to accommodate displaced businesses in the town centre / at housing allocations.

Only 23 of the 20,000+ comments received by the Council raised concerns or objected to the North Slyfield Site (0.1 % of all responses). There is therefore not a significant degree of local opposition to the North Slyfield Site’s removal from the Green Belt and employment allocation.

The key issues raised by respondents related principally to issues that have been addressed by NLP (on behalf of our client) in its original 29 November 2013 representations and which were found to be acceptable, at the time, by the Council in preparing the draft Local Plan (i.e. loss of Green Belt and the visual impacts of industrial development). Other matters including traffic, flood risk, noise and pollution impacts are capable of mitigation, would not have significant adverse impacts and would not outweigh the considerable economic and employment benefits. Importantly, these are development management matters which it would be appropriate to consider at the planning application stage.

Our letter (Annex 6) responding to the representations that were received contains further details.

**Conclusions**

The Proposed Submission Local Plan is unsound because it fails to positively and pro-actively plan for economic growth in the right place and at the right time as required by the NPPF:

1 The Plan fails to allocate a sufficient quantity of land in the Borough to meet demand and the need for employment floorspace, particularly for industrial and storage premises because the ELNA (2015) is 1) over-reliant on historic trends to estimate future requirements and 2) has limited consideration to local business and market conditions to inform the future requirements. These limitations reduce the soundness of the forecast requirements for industrial and storage land, and the actual amount of land that should be planned for should be higher than the currently proposed requirement. The failure to positively prepare to provide adequate employment land is also unsound because it is inconsistent with NPPF national policies to build a strong and competitive economy, and pro-actively meet the development needs of Guildford.

2 Qualitatively, the Plan fails to positively plan for additional employment land at SIE (a strategic employment site) to ensure that the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses. The ELNA itself highlights demand for businesses to locate to SIE, which currently has as little as 185sq.m of vacant industrial space, and limited prospects for intensification or additional space at the site. The North Slyfield Site is the only option available to expand industrial and warehousing at SIE and to plan for economic growth at the strategic location in the Borough where there is most demand.

3 Further, the North Slyfield Site is the only location that can support the industrial market in the Guildford Urban Area, and it is far more likely to be delivered than the proposed allocations at Wisley Airfield and Garlick’s Arch (which cannot draw on the market value of an established strategic industrial location).

4 Allocation of the North Slyfield Site would also have other benefits for Guildford Borough:

- Providing land for displaced businesses could support the release of previously developed employment sites in the town centre for housing development in accordance with the Guildford Town Centre Vision.
- Supporting housing delivery on urban brownfield sites would help ease pressure on the release of Green Belt land.
• An allocation at the North Slyfield Site could also help to unlock the stalled SARP scheme by relocating some of the existing or proposed industrial / storage / light industrial uses at SARP to SIE, which would allow a greater proportion of housing to be developed at SARP and boost the potential development value of the project. The failure to take such benefits into consideration also indicates that the Proposed Submission Local Plan has not been positively prepared, is inconsistent with national policies and is, therefore, unsound.

5 In addition to the strong economic / employment arguments in favour of allocating the North Slyfield Site for employment purposes, it is equally important to recognise that the North Slyfield Site is not a sensitive part of the Green Belt. Its release from the Green Belt for development would satisfy all five purposes of the Green Belt and there is no reason for the Council to depart from its original acceptance of this finding. Furthermore, Wisley Airfield and Garlick’s Arch are more sensitive in landscape, heritage and habitat terms.

6 The other sites also have a number of constraints meaning that employment floorspace would be unlikely to be delivered within the short term (i.e. over the next five years). In contrast, the North Slyfield Site is readily available for development, with co-operative landowners and good quality infrastructure supporting delivery. It is also in a location that would be more attractive to the market and meeting demand. The risk profile associated with the North Slyfield Site is therefore low.

7 Finally, the allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders.

For these reasons, the 4ha North Slyfield Site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8. We urge the Council to reinstate the employment allocation for the North Slyfield Site in the Submission Local Plan that will be sent to the Planning Inspectorate for examination.

<see attached documents for appendix>

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

Attached documents: 13719 Proposed Submission Local Plan (Reg 19) Consultation Rep 18.07.16.PDF (8.3 MB)

Comment ID: pslp171/3257  Respondent: 8973377 / Cassidy Slyfield Ltd. (Cassidy Slyfield Ltd)  Agent: Nathaniel Lichfield & Partners (Steven Butterworth)

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

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

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

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

The amendments to Policy E1 and its reasoned justification, and the underpinning updated evidence base, do not alter our assessment such that the Local Plan remains unsound for the reasons cited in our July 16 representation.
Specifically, we note that following the publication for the revised ELNA (March 2017), the allocation of industrial land (B1c, B2 and B8) has reduced further from a range of 4.7-5.1ha to 3.7-4.1ha. Policy E1 is unsound because the policy has not been positively prepared, adequately justified, is not effective in meeting the needs and therefore remains inconsistent with the NPPF, as it does not allocate sufficient land to provide a range and choice of employment premises over the plan period to accommodate growth required for the borough’s economy to develop and strengthen.

**Plan Modifications Sought**

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

**Allocation Reasons Summary**

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

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

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

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

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

**Concluding Remarks**

The 4ha North Slyfield Site should be removed from the Green Belt and be allocated in the Guildford Local Plan for employment development within Classes B1c, B2 and B8, to make the Policy E1 and the employment Site Allocations within the PSLP sound.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

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

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

- An additional Site Allocation is identified within the Guildford Urban Area as set out below:
The settlement boundary in this part of East Horsley remains unchanged from that in the Guildford Local Plan (2003). However, we consider that this is an oversight and ignores the potential that this could make to the provision of additional housing at the margins of what is one of the larger and most sustainable settlements in the Borough. The settlement boundary should therefore be reviewed and altered to include this site. We are asking therefore, that our site should be inset from the Green Belt alongside the rest of East Horsley.

To help support this representation, a plan of the Site is provided which demonstrates how this is well-related to the margins of the existing settlement and how it could successfully accommodate development within clear defensible boundaries as acknowledged in the GBCS. Those clear defensible boundaries should become the new settlement boundary in this location, with the land within this becoming inset from the Green Belt as a result.

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

Attached documents:
development site, which we consider to be an oversight, both in terms of the need to identify a range of sites for development to meet need, and the assessment of this site’s suitability for residential development.

The settlement boundary in this part of East Horsley remains unchanged from that in the Guildford Local Plan (2003). However, we consider that this is an oversight and ignores the potential that this could make to the provision of additional housing at the margins of what is one of the larger and most sustainable settlements in the Borough. The settlement boundary should therefore be reviewed and altered to include this site. We are asking therefore, that our site should be inset from the Green Belt alongside the rest of East Horsley.

The aim of this written representation is to demonstrate that the Site should be included within the new settlement boundary, is suitable for residential development and that it represents a deliverable source of land capable of providing for up to five dwellings in the short term which itself will contribute towards addressing the significant shortfall in dwelling provision in the Borough in recent years.

We will place the need for this site in context by examining the robustness of the evidence base on which the DLP has been produced as well as highlighting the suitability of the site and its deliverability. Finally, comments will be made on some of the wider strategy based policies and the impact that these may have on deliverability and providing for the need identified by the Council.

To help support this representation, a plan of the Site is provided which demonstrates how this is well-related to the margins of the existing settlement and how it could successfully accommodate development within clear defensible boundaries as acknowledged in the GBCS. Those clear defensible boundaries should become the new settlement boundary in this location, with the land within this becoming inset from the Green Belt as a result.

Site and Surroundings

The Site is comprised of a maintained paddock to the east of Heathway. This land was formerly part of the gardens of the houses to the north (Tsala and Wild Acres), before this was sold to the landowner. It now represents an undeveloped site approximately 0.3 ha in size. The extent and position of this area (herein referred to as “the Site”) is shown in the enclosed plan at Appendix 1.

Access to the site is along Heathway from an existing vehicle entrance towards the north of the site. The northern boundaries of the Site are clearly defined by the rear of the properties ‘Pantiles’ and ‘Wild Acres’ which front onto Orchard Close further to the north. The street at Heathway forms the western boundary, beyond which is an area occupied by large dwellings. Its southern and eastern boundaries are delineated by a woodland area which is owned by the Council and which separates the existing residential area from the wider Effingham Common, an area of common land that lies the east of the Site and which falls entirely within the Green Belt.

The Site is within walking distance of two main line railway stations – Effingham Junction which is approximately 0.7 miles to the north-east and Horsley Station which is approximately 1.3 miles to the south-west. There are also bus services which provide access to both. Local shops are located around the railway station therefore amenities are also within a reasonable walking distance or by public transport Photographs of the Site from various vantage points are enclosed in Appendix 2.

In general terms we and the Council consider that East Horsley is an appropriate village for expansion and therefore can accommodate further areas of development than currently identified. It is well located to the urban area of Guildford with the A246, which is the primary road linking Guildford with Leatherhead, providing direct access to the village. It is located within close proximity of surrounding villages (Effingham and Great Ockham) both of which are easily accessible by road and public transport, thus expanding the facilities and amenities that are available to local residents. East Horsley therefore is a sustainable location, where appropriate development should be encouraged and viewed positively.

The containment of the Site results in a clear physical separation with the wider Green Belt. As such the site is fully enclosed and contained from the wider Green Belt, and as referred to above the woodland block is a strong defensible barrier, that is controlled by the Council and will ensure that any development is not visible from the wider area.

Full account should also be taken of the detailed representations previously made in a document dated 22 September 2014 (on Alliance Planning heading prior to WYG integration).
2.0 HOUSING AND POLICY CONTEXT

Guildford BC planning context & housing numbers

Guildford BC is currently in the process of producing a new Local Plan which is to cover the period 2013 – 2033 and guide development within the borough and is to be compliant with the National Planning Policy Framework (NPPF). This representation is in response to the Regulation 19 consultation phase for the pre-submission version of the draft Local Plan. WYG are pleased to have been given the opportunity to make representations on this concerning the Site and general planning matters within the Borough. WYG are also pleased that Guildford BC has acknowledged the significant challenges that the borough faces in delivering sufficient housing to meet its needs. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The reliance on this figure has meant that Guildford BC has significant under-delivered on their housing requirements over the past five years as shown in the below table:

<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completion</th>
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<tr>
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<tr>
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<td>13/14</td>
<td>137</td>
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<td>14/15</td>
<td>242</td>
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As the housing completions above show, Guildford has not only been under-delivering against the now up-to-date Objectively Assessed Need (OAN) but there has also been consistent under-delivery against the interim housing target.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR notes “the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”. The recommendation within the AMR following this states that “housing provision is currently restricted by the lack of available and deliverable development land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for development”. This shows the necessity for suitable and available sites to be considered and this should apply to all sites within the borough that meet this criteria. Our client is the landowner of Lanes End, and the Site is available for development. We have set out below the reasons as to why the site should be excluded from the Green Belt and included within the built up area of East Horsley. It is a suitable and deliverable site which will assist in the supply of land to contribute to meeting the severe housing need in the Borough.

Objectively Assessed Need

Guildford Borough has an identified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford.

The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000. This increase is anticipated to be greater than shown by the 2012 population figures. The 2012 figures informed the SHMA which in turn has provided the basis around which the housing requirement for the new Local Plan is formed. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. We and the landowner would question the validity of the figures and believe that the OAN to inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the
2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards, further supporting the proposed allocation sites and insetting villages from the Green Belt.

**Five-year supply of deliverable housing land**
Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to

“Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%”.

It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is therefore clear that without significantly more available land, Guildford cannot expect to be able to show a five year supply. The NPPF para 83 states that “Green Belt boundaries should only be altered in exceptional circumstances” however, as the site is surrounded by development, and is in many respects an area of “washed over” Green Belt, that is naturally part of the village, we conclude that the site should be looked on favourably as a suitable development site within the inset area from the Green Belt.

**Housing requirements within new Local Plan (2013-2033)**

The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that:

“The delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”.

The draft Local Plan sets out the housing delivery in different tranches as below:

**Annual Housing Targets (as set out in the draft Local Plan – Policy S2)**

<table>
<thead>
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<td>2032/2033</td>
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The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. Therefore it is vital that existing allocations in the draft Local Plan are retained and that those which are suitable and deliverable, particularly within the near future, such as the Lanes End Site remain within the Plan and are supported to come forward.

**FURTHER JUSTIFICATION**

**Horsley in Plan Making**

The weight of policy support for the scheme is already strong.

The site was identified within the previous emerging Local Plan which was released in 2014. The site has been promoted throughout the development of the emerging Local Plan process and previous representations for this site were submitted in September 2014 as part of the Local Plan consultation under regulation 18.

The proposed area to be inset from the Green Belt includes Lanes End, East Horsley, to come forward as a development site within the new effective settlement boundary of East Horsley. We are requesting that the settlement boundary in this location should be reviewed.

In reviewing Green Belt boundaries, it is important to consider the merits of development in terms of whether residential development on this site would conflict with the purposes of Green Belt land. The Council’s own assessment (in the form of the GBCS) concludes that this site has clear defensible boundaries.

It is estimated that based on the size of the Site and its proximity to the highway at Heathway that it is capable of accommodating up to five dwellings.

The site is in flood zone 1, at low risk. However, surface water management needs to be managed appropriately and could be achieved by a sustainable urban drainage strategy. This would not be a constraint to development.

The site was garden land in the Green Belt so is officially identified as unclassified land. This would not be a constraint to development.

Access is not considered to be a highway safety constraint to the site being developed as the road is adjacent. There are numerous potential areas where vehicle access can be taken from Heathway. There are no topographical or other physical constraints to the development of the site.

In relation to the ‘five tests’ of whether the land fulfils the purposes of the Green Belt, we consider that it does not. The proposed development and insetting of the site within the East Horsley settlement boundary will not lead to issues of coalescence as it would appear as a natural extension to the village. It will not form linkages with other settlements and will set precedent for further development, due to the physical parameters of the Site. It will not harm the purpose or openness of the wider Green Belt and countryside and the Site is isolated from the wider Green Belt.

In terms of landscape character, this will not be harmed as the Site is within an area that is clearly defined and has defensible boundaries. The boundaries provide a level of containment, which when coupled with extensive vegetation screening makes this site a far less sensitive location for housing, than many others. This should not be a constraint to development.

The development of part of the site will not have an adverse impact on the character of the countryside in which it is located, nor will it be visually detrimental to the character of the existing residential amenities to the north, west and south-west. Furthermore the retained and proposed landscaping will ensure that important landscape characteristics are retained and that an attractive setting is created.

Suitable Sang provision is proposed in the Proposed Submission Local Plan which is supported and would overcome this potential issues.
The Proposed Submission Local Plan confirms that well designed homes would be attractive to the market, are deliverable, would help towards meeting housing numbers in the Local Plan and would contribute towards achieving sustainable, inclusive mixed communities.

The fact that the site is available and under the control of one owner, therefore being able to be delivered within five years should carry significant weight, as many other sites and areas are in multiple ownerships.

The site is well contained and is adjacent to existing development.

We estimate that the number of proposed dwellings is 5 and detailed considerations would look at the best way to achieve this number of dwellings on the site. The site can make a meaningful contribution to the housing requirements of East Horsley (and to the 5 year housing land supply in particular) and to the wider spatial and development aspirations for the Borough and its citizens. This fact should also support the proposal in the Submission Local Plan to continue with the existing approach regarding East Horsley, inserting the village and including development sites, and this Lanes End site.

A strong material consideration is Policy P2: Green Belt, which states that “limited infilling may also be appropriate outside the inset or identified settlement boundaries…where it can be demonstrated that the site is as a matter of fact on the ground within the village”. This site was previous garden land to two properties now considered to be within the village of East Horsley and so meets this criteria (Appendix 3).

This representation strongly supports the position put forward in the NPPF, the Submission Local Plan and the Neighbourhood Plan in respect of inserting the village, the proposed boundary to that inserting and the proposed development of the site for an appropriately designed residential scheme. We support the approach taken in Policies P2 and S2 of the Submission Local Plan with regard to inserting villages from the Green belt and allowing for some element of planned extension of those villages to accommodate existing and future housing need.

4.0 CONCLUSIONS

Conclusion

In conclusion, the site should be inset from the Green belt, as shown on the attached Submission Local Plan Map, in the Submission Local Plan for the following main reasons:

- The inset has been supported through the Green Belt and Countryside Study, the Draft Local Plan 2014, the Draft Vision and Objectives of the East Horsley Neighbourhood Plan and the current Proposed Submission Plan 2016, taking into account the many previous representations made, confirming its credentials as a robust way forward;
- The site would deliver much needed housing both for East Horsley and the wider borough;
- The site is available and deliverable under a single ownership within a 1-5 year period;
- The site is in a very sustainable location close to amenities and local facilities;
- There are no significant constraints beyond the normal development management issues which can be dealt with by consultation and negotiated resolution;
- The acceptability of inserting the site and surrounds has already been demonstrated to be acceptable in Green Belt terms due to its relatively enclosed nature, village location and limited contribution to Green Belt objectives; and
- The scheme will generate section 106 contributions.

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

Attached documents: Heathway Written Reps on GBC Local Plan8.jpg (618 KB)  
Heathway Written Reps on GBC Local Plan2.jpg (354 KB)  
Heathway Written Reps on GBC Local Plan1.jpg (342 KB)  
Heathway Written Reps on GBC Local Plan7.jpg (264 KB)  
Heathway Written Reps on GBC Local Plan.jpg (202 KB)  
Heathway Written Reps on GBC Local Plan5.jpg (256 KB)
Comment ID: SQLP16/1932  Respondent: 8973537 / D. Connor  Agent: Andy Stallan (WYG)

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

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

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Refer to the accompanying separate representation submission document dated 15th July 2016 for details.

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

Attached documents:

Comment ID: PSLPS16/6671  Respondent: 8974177 / Nigel Mitchell  Agent:

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

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

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

I note that the strategic site include Blackwell Farm and Flexford and Normandy. These two proposed developments are in areas that cannot support the additional dwellings and other proposals because the local infrastructure is insufficient in particular the need for access and the disposal of both stormwater and sewage effluent.

Whilst future planning application will be judged under the umbrella of the Local Plan, there are a number of development proposals currently being prepared that are likely to be submitted before the Plan is adopted. The Council should take a view on these consistent with the view of the Local Plan.

In particular the proposals for the following locations

- Rokers Golf Course
- Hunts Farm
- Merrist Wood College
- Liddington Hall
It has been suggested by Guildford Colleges to their staff that they wish to develop Liddington Hall to finance improvements to Guildford College. Whilst acknowledging that the college buildings are getting old, the first option should be to refurbish and maintain them in good order. New buildings do not necessarily attract new students, a reputation for high performance however does, and this does not seem to be the case for Guildford Colleges.

Liddington Hall has also been identified within the Local Plan as being High Quality Green Belt land and provides a corridor between Whitmoor Common, Chitty’s Common and onto Backside and Broadstreet Common.

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

Attached documents:

Comment ID: PSLPS16/6672  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

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

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

A19 Land at Westway

Support

This site has lain dormant since RSCH removed their park and ride facility and therefore should be developed as soon as possible.

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

Attached documents:

Comment ID: PSLPS16/6673  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
A21 Land at Westborough allotments

Support

We need allotments so that people can grow their own vegetables and the land will provide space for invertebrates’ and insects which are as important as dwellings for the continued development of Guildford.

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

Attached documents:

Comment ID: PSLPS16/6674  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

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

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

Object

This site has been taken out of the Green Belt by the moving of the urban boundary to enclose it, which no doubt is excluded from the percentage of green belt used for the development.

The site is within a rural setting with the road infrastructure a serious concern. At the western end of Keens Lane the road is 4.4m wide from the kerb outside Sydney Court to the south and Timbers to the north. Timbers is a 16th Century building which has been maintained to a high standard by the current owners. Therefore widening the road to increase the traffic capacity is not an option. The roundabout to the eastern end of Keens Lane is treated as a chicane by the vehicle entering it from both the north and south and is therefore dangerous.

The sewer system in the area is at capacity. Indeed during the recent storms on 23rd June the manholes in Gravetts Lane were overspilling and bubbling up onto the road.

Rainwater run off carrying silt and other debris from Keens Lane and Findlay Drive drains into a soakaway drain in Sime Close. This drain is now full of silt and constantly fails to drain away leaving a large volume of water across the road. Further hardstanding within a development to the north of Keens Lane will make this problem worse.

There is insufficient electricity provision within the area as experienced by the number of power outages during the winter.

Worplesdon Road is already one of the worst roads in the borough for traffic congestion and an additional 140 homes and a care home would add to this congestion.

The site is close to Whitmoor Common and as such would be protected by the constraints associated with the SPA but these appear to have been ignored.

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

Attached documents:

Comment ID: PSLPS16/6675  Respondent: 8974177 / Nigel Mitchell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

Attached documents:

Comment ID: PSLPS16/6676  Respondent: 8974177 / Nigel Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

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

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

Whilst supporting this proposal it is not necessary to move the urban boundary to allow this development to happen.

The location requires significant improvements to the local infrastructure including safe access for all users of the burial ground including pedestrian access and changes to the traffic signalling.

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

Attached documents:

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Comment ID: PSLPS16/6677  Respondent: 8974177 / Nigel Mitchell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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

A26 Blackwell Farm

Object

The majority of this site should be within the AONB

Access to the site along Gill Avenue will cause issues for the smooth running of the RSCH and add to the traffic congestion in the Research Park.

Lack of infrastructure generally

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

Attached documents:

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Comment ID: PSLPS16/6678  Respondent: 8974177 / Nigel Mitchell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
A30 Ash Road Bridge

Comment

It is difficult to see how a bridge over the railway at this point will be achieved as a minimum clearance of 5m needs to be achieved. With a gradient of the road of say 1 in 20 and a structural build of 1m (minimum) a ramp would need to be 120m long to both sides of the railway. The land allocated for this proposal does not appear to be sufficient.

Whilst generally understanding the need for a bridge, I am concerned with the impact on the flow of traffic on the Aldershot Road. The current level crossing acts as a constraint on the traffic and drivers take notice of it by allowing time to get across the level crossing. By providing a bridge the constraint will be removed and drivers will leave later causing congestion at a later point along the Aldershot Road. The likelihood is that the Rydes Hill roundabout will be further congested.

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

Attached documents:

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Comment ID: PSLPS16/6679  Respondent: 8974177 / Nigel Mitchell  Agent:

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

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

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

---

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

Attached documents:

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Comment ID: PSLPS16/6680  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

A43a North Facing slip roads to/from A3 at Send Marsh/Burnt Common

Object

Whilst acknowledging that additional access and egress to the A3 would be desirable, the likelihood is that this will increase the flow of traffic through Send and Burnt Common. It will reduce traffic through Ripley and assist in the reduction in traffic at Wisley, and therefore benefit that proposed development. The on and off slip roads would be used by traffic from Woking and there appears to be no evidence of collaboration with Woking Borough Council on this route.

The entrance to the junction on Clandon Road will need to be significantly improved so that there is no additional congestion on the new off slip from the A3. I would suggest that a new roundabout will be required as the current right turn is only occasionally used; if this proposal were to be delivered the right turn would be in constant use by vehicles going to Woking.

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

Attached documents:

Comment ID: PSLPS16/6681  Respondent: 8974177 / Nigel Mitchell  Agent:

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

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

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

A46 Land at Normandy and Flexford

Object

The size of this proposed development is inappropriate for the area.

The addition traffic caused by the development will significantly impact on the Aldershot Road during both morning and evening rush hours.

There are constraints on the proposed development by the two railway bridges on unclassified roads.

The lack of infrastructure in the area needs to be addressed before development commences.

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

Attached documents:

Comment ID: PSLPP16/14024  Respondent: 8974177 / Nigel Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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

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

Support

However the level at which play facilities should be provided needs to be reduced to 10.

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

Attached documents:

Comment ID: PSLPP16/14023  Respondent: 8974177 / Nigel Mitchell  Agent:

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

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

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

E7 Guildford Town Centre

Object

Here is considerable evidence that there are significant changes in the methods of shopping by the residents of the United Kingdom. The use of the internet is increasing and trips to department stores are reducing.

In addition Guildford is a dormitory town taking the overspill from London. This could be addressed by the provision of one and two bedroom apartments for weekday commuters, and the ideal location for these developments would be the town centre, which would reduce both traffic congestion and pollution.

Therefore the policy for additional retail facilities within the town centre should be amended and additional affordable housing provided in its place.

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

Attached documents:

Comment ID: PSLPP16/14015  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
1. Guildford needs to have a positive outlook towards improving the environment for all of its residents this includes the air quality as well as the development of the borough and its standing within the greater. It could be that because of the special circumstances that Guildford finds itself only limited housing can be achieved.

2. There is considerable evidence that car manufacturers are lying about the emissions from vehicles and Guildford should take a stance to address this by applying a levy to the car manufacturers for the pollution that their deception is causing and in so doing improving the environment form the

3. The aspiration for a tunnel under the A3 will remove through traffic from the rush hour crisis but it will not remove the need for residents of Guildford to access and egress the A3, and therefore not assist with the improvement of the traffic.

4. The proposals for SANG’s to offset the need for access to Whitmoor Common appear to be misguided. It would be better to reduce the housing density and provide park space and open land within developments hence reducing traffic on already congested roads. Why travel to a SANG when you could walk your dog or cycle around your own estate?

5. Infrastructure improvements should be carried out by the developers before commencing work on any development to demonstrate to the current residents that they are engaging with local community and cognisant of the needs of those. All too often the developer is only concerned with delivery and walking away ignoring the issues that they leave behind them. If this approach means that a development is not viable then the point is proven. This approach has been carried out by another local authority successfully and therefore the precedent is already set.

The SHMA exaggerates the number of dwelling that are required in the development. This is referenced by Neville Byran’s letter in the Surrey Advertiser dated 10 June 2016.

Guildford is unfortunately a dormitory town for London and the growth of London should be met by the London Boroughs and not fed out into the surrounding Home Counties.

There appears to be double counting of the University’s requirements plus the growth that the University has experienced in the last few years is expected to continue. With the view that further education courses are becoming more expensive this continued growth is unlikely to happen.

The DCLG Planning Policy for Travellers Sites dated August 2015 should apply in all cases.

I make the following conclusions about the Section 19 Local Plan:

1. The SHMA figure needs to be reduced by having constraints applied to
2. The quoted 6% of Green Belt proposed to be developed is misleading, and has been used to justify an election promise that has been ignored.
3. There is no indication of the duty to co-operate with all the surrounding boroughs and statutory authorities.
4. The arbitrary movement of the urban boundary to move sites out of the green belt is a political expediency to reduce the green belt land.
5. He plan is unsound.

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

Attached documents:

Comment ID: PSLPP16/14020  Respondent: 8974177 / Nigel Mitchell  Agent:
The current infrastructure in Guildford Borough is woefully inadequate, note that every Friday evening and most weekdays the A3 is congested from Burpham to the A31 junction.

Recently there were roadworks on Ladymead which required the closure of one lane, this caused traffic congestion on the A322 back and beyond the Keens Lane roundabout for 6 weeks during the daytime.

- The sewage treatment works are at capacity.
- The Hospital is at capacity, even though it is losing money.
- There is a lack of electricity supply in the area.

We are led to believe that there is a lack of places in senior schools for the current primary school pupils, which is being addressed by the proposal for additional schools at the strategic sites, but this will add to the congestion on the roads.

The public transport system is not being improved, indeed there will be areas within the borough where there will be no buses in the near future, resulting in additional traffic.

Healthcare provision, Doctors, Dentists, Opticians, improvements or extension of the RSCH have not been addressed in the Local Plan.

Infrastructure improvements should be installed before any development works commence; this will have two benefits showing that the developer is aware of the needs of the existing residents and the provision of the upgraded infrastructure for the new residents. The developer will then be seen as being part of the community both existing and new.

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

**Attached documents:**

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**Comment ID:** PSLPP16/14025  **Respondent:** 8974177 / Nigel Mitchell  **Agent:**

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

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

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

Support

However the level at which play facilities should be provided needs to be reduced to 10.

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

**Attached documents:**
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<thead>
<tr>
<th>Comment ID: PSLPP16/14026</th>
<th>Respondent: 8974177 / Nigel Mitchell</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

11 Infrastructure and Delivery Object

This policy will not deliver the required infrastructure improvements required to support the existing residents and proposed developments within the Local Plan.

Developers need to be encouraged to install infrastructure improvements before developing a site and by so doing demonstrate that they are engaging with the community in a responsible and fair way.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/14018</th>
<th>Respondent: 8974177 / Nigel Mitchell</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

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

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

The Local Plan makes great store by the fact that only 1.6% of green belt land is being used for new development. This is not true for the following reasons:

- 89% of the borough is Green Belt
- 49% of the borough is within the Area of Outstanding Natural Beauty which cannot be developed under current
- Villages that were included within the green belt have been removed from it, this area is not quantified in the
- The 6% of Green Belt proposed for development relates to the remaining land within the Green Belt and is therefore 4% of Green Belt land.
- The area that is being developed could be better quantified as 50 football pitches or the equivalent of 5 Stoke Park’s.

For all the above reasons the 1.6% stated within the document is misleading in the extreme.

Support

This policy needs to recognise that the joining of Guildford with surrounding boroughs must be strongly and strenuously avoided.

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

Attached documents:
**Comment ID:** PSLPP16/14021  **Respondent:** 8974177 / Nigel Mitchell  **Agent:**

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

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

**Support**

However the Developer needs to both theoretically and physically prove that any development is sustainable. The developer should not be allowed to pass over the operational use of the development to the end users and then walk away. A Planning Condition should be added to any approval that the developer must collect data for a period of no less than 5 years to prove the sustainable credentials of the development. If this data does not demonstrate the proposed benefits then the developer should be required at his own cost to introduce additional measures to meet their proposals. By use of this planning condition the developer will be seen to be engaging with the community.

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

Attached documents:

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**Comment ID:** PSLPP16/14022  **Respondent:** 8974177 / Nigel Mitchell  **Agent:**

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

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

**Object**

The calculation of the SHMA is flawed as demonstrated above and must be reviewed as a priority.

Guildford is unfortunately a dormitory town for London and the growth of London should be met by the London Boroughs and not fed out into the surrounding Home Counties.

There appears to be double counting of the University’s requirements plus the growth that the University has experienced in the last few years is expected to continue. With the view that further education courses are becoming more expensive this continued growth is unlikely to happen.

In addition the economic growth that the SHMA is based upon is unlikely to occur due to the decision by the Great British public to exit the European Union. We are already seeing property development funds closing because of the concerns about the fallout from the decision on leaving the EU.

There is also a report prepared by GRA that demonstrates that the need for dwellings within the period of the local plan can be significantly reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
This report presents the detailed representations of Sustainable Land on Policies P2 and S2 of Guildford Borough’s Proposed Submission Local Plan: Strategy and Sites (June 2016). It is accompanied by a preliminary Landscape and Visual Appraisal, Appendices on Housing Targets and Green Belt Review, and completed consultation questionnaires for Policies P2 and S2.

This report and its appendices reveal a failure of the draft Local Plan to meet the full objectively-assessed need for housing, over the whole of the plan period, and a failure to achieve a five-year supply of housing land on adoption of the Local Plan. Policies P2 and S2 are not sound because the Spatial Strategy and Green Belt policy do not achieve the delivery of housing in accordance with objectively assessed housing needs throughout the plan period.

To make the plan sound will require the release of additional sites for housing development that can be made available in the early years of the plan. The most sustainable options will include small and medium-sized sites that are closely related to the main urban areas and other significant settlements where they can make use of existing infrastructure, such as schools and other services.

This report demonstrates the suitability for release from the Green Belt and allocation for housing development of an area of land north of Keens Land and Gravetts Land and south of Worplesdon Road to contribute to meeting housing requirements in a sustainable location without significant harm to Green Belt or landscape considerations. It analyses opportunities and constraints and presents an indicative development framework that responds to these opportunities and constraints.

2. In its previous responses, Sustainable Land commented on the Council’s approaches to the objective assessment of housing needs and Green Belt review, and identified a sustainable, potential location for the development of housing and other uses north west of Guildford, based on extending an area of land identified by the Council as Parcel J3, south of Worplesdon Road, westwards across Tangle Lane: to create a new, long-term, defensible Green Belt boundary along the course of the brook that runs south-west from Whitmoor Common, with the Golf Course further to the west providing a clear gap with Fairlands.
3. This report responds to the Regulation 19 Consultation on the Proposed Submission Local Plan: Strategy and Sites published in June 2016 and its evidence base, including the Green Belt & Countryside Study (GBCS), the West Surrey Strategic Housing Market Assessment (SHMA) of October 2015 and the Land Availability Assessment (LAA) of February 2016, which are the subjects of appendices to this report.
4. This submission does not challenge the findings of the SHMA, but questions whether the Council has positively sought opportunities to meet the development needs of their area; whether the local plan meets objectively
assessed needs, with sufficient flexibility to adapt to rapid change; and whether the plan takes account of unmet needs from neighbouring authorities through the ‘Duty to Co-operate’.

5. In particular, this submission challenges the ability of the Local Plan to meet objectively assessed housing needs throughout the plan period, in the light of information contained in the LAA and the Council’s approach to phasing in Local Plan Policy P2.

6. It is admitted in paragraph 4.1.9 of the Local Plan that the spatial development strategy contained in this policy inhibits the delivery of housing in the early years of the plan, with a phasing policy that defers housing supply and is not justified by the SHMA analysis of housing requirements. There are also questions about whether the Local Plan has responded to the ‘Duty to Co-operate’ by considering shortcomings in the spatial development strategy are due to failings in the GBCS which are reflected in Local Plan Policy S3. The GBCS dismissed a number of sustainable locations for development within the Green Belt that associated with the main urban areas and other settlements, including the area of land at Worpleston that is the subject of this report, part of which was identified earlier in the GBCS as a Potential Development Area (PDA).

7. There have been a number of changes in site allocations proposed in the Local Plan, since the previous Regulation 19 consultation of July 2014, which are not explained.

8. The previous Local Plan consultation proposed the allocation of a 27 ha site at Liddington Hall (south of Keens Lane/Gravetts Lane and north of A323 Aldershot Road) for housing and a traveller site. This location, identified as Site 62, had previously been identified as a Potential Development Area in the GBCS (Land Parcel J1). It is no longer proposed to be allocated and is shown as remaining in the Green Belt.

9. Land south of Worpleston Road and west of Tanglely Lane (Site 102) was previously proposed for use as a crematorium, whilst still being ‘washed-over’ by Green Belt. The framework plan for development at Tanglely Place Farm, proposed by Sustainable Land in their previous representations, was consistent with that proposal; unifying the use with open space, including a SANG and landscaping, to the south of the proposed crematorium.

10. A crematorium is no longer proposed at Worpleston Road/Tanglely Lane in the current consultation and another site at Salt Box Lane has been identified for a ‘burial ground’. The new location (Site A23) is in a corner of the Whitmoor Common, with the SPA on two sides. The proposed burial ground will require a Habitat Regulations Assessment and special, unspecified measures to control access and car parking at the burial ground in order to limit additional recreational pressures on the SPA.

11. The framework plan for land at Tanglely Place Farm proposed by Sustainable Land does not depend on the proposal for a crematorium or burial ground to the north of the site, although the proposed open space, including SANG and landscaping, would have made it a more successful solution than the site at Salt Box Lane within the SPA.

12. The proposed allocation north of Keens Lane (formerly Site 61), to the south of Tanglely Place Farm, has been retained as an allocation in the Local Plan for about 140 homes and a care home (Site A22).

13. The context for development proposals at Tanglely Place Farm, reflecting the proposals of the Local Plan, is therefore now an area of proposed housing north of Keens Lane, an area of existing housing north of Gravetts Lane, the brook and golf course to the west and areas of open space to the north.

Site analysis

THE SITE

The site is an irregular shaped area of land covering approximately 45.52 hectares. It is located approximately 2km north west of Guildford town centre. Its boundaries are defined by the A322 to the east, Keens Lane and Gravetts Lane to the south, and by more open land to the west.

LAND USE

The site is primarily occupied by farmland with a significant portion of this being occupied by equestrian uses.

There are small clusters of dwellings within the site boundaries, primarily in the eastern portion of the site.

In addition, there is a recently-constructed Care Home towards the north eastern corner of the site, and a plant nursery close to the eastern boundary.

Existing residential neighbourhoods lie to the south and east of the site.
The south eastern quadrant of the site is a proposed housing allocation within the draft Guildford Borough Local Plan.

ACCESS AND MOVEMENT

The existing developed areas to the south and east of the site provide widespread pedestrian access, whilst a number of public rights of way terminate at the site’s north eastern boundary. These rights of way provide access to the attractive common land north east of the site.

There is a single public right of way which crosses the south eastern boundary of the site connecting Keens Lane with the A322.

There are existing bus services which run along the A322/Worplesdon Road connecting the site with Guildford town centre. From Guildford town centre, it is possible to take a direct train to central London.

At this early stage it would appear that vehicular access is possible from Keynes Lane on the site’s southern boundary, from Gravetts Lane on the southern boundary; and potentially from the A322/Worplesdon Road on the site’s northern boundary.

LANDSCAPE FEATURES AND ECOLOGY

In general terms, the site is more vegetated in its eastern portion with a network of hedgerows and trees forming field boundaries within this part of the site.

The western portion of the site is more open and there is less in the way of vegetated field boundaries.

It is likely that the vegetated field boundaries provide habitats for wildlife and should any development occur on the site, then clearly these will need to be retained wherever possible.

It should further be noted that large parts of the site are unconstrained by existing vegetation. Further detail on existing landscape conditions is provided in the accompanying landscape submission.

An existing watercourse forms the site’s western boundary, which again is likely to provide habitat for wildlife. Whilst disturbance to this should again be limited where-ever possible, the proximity of the watercourse as wildlife habitat is not significant constraint to development.

TOPOGRAPHY

In general terms there is a shallow ridge line forming an east/west axis across the site. The site also slopes in a northerly direction from the site’s southern boundary. From the above mentioned ridge line, the site also slopes gently northward towards the site’s northern boundary.

Steeper slopes exist close to the western boundary and slope in a direction of the existing brook.

Whilst no parts of the site are expected to slope steeply enough to cause issues from an engineering perspective, the raised portions to the site do result in some portions of the site being more visually exposed than others. This is addressed in more detail below and within the accompanying Landscape Report.

VISUAL CONTEXT

The most visually exposed portion of the site lies towards the site’s western boundary and one viewpoint in particular allows views across this portion of the site. For a short section of the Worpleson Road on the site’s northern boundary, a view is aligned across the western portion of the site south westward towards the Surrey Hills Area of Outstanding Natural Beauty. It would be desirable from a landscape and visual impact perspective, therefore, to limit built development in the north western portion of the site.

By contrast the eastern portion of the site is enclosed by existing vegetation which suggests the possibility of built development without undue impact on the openness of the surrounding countryside.
It is considered that the southern portion of the western half of the site is capable of accommodating built development without undue visual impact.

There are no public rights of way across the west of the site, which further reduces views into it from this direction.

**DRAINAGE**

For the most part, the site is devoid of water bodies and water courses which might give rise to flood constraints.

However, the brook which forms the western boundary of the site does have an associated flood plain, although this encroaches very little into the main body of the site.

**SERVICES & FACILITIES**

The bus service that runs along Worplesdon Road connects the site with Guildford town centre to the south east.

A wide range of services and facilities are located within the town centre, with additional local services situated on Worplesdon Road and Pitch Place to the east in walking distance of the site (see plan opposite).

**Opportunities and Constraints**

**Opportunities-**

- The opportunity to provide a significant amount of housing and complimentary uses within easy reach of shops, services and facilities;
- The opportunity to establish new development in a site which, for the most part, is unconstrained by ecology or landscape designations;
- The opportunity to provide housing in a location with good access to open countryside and attractive recreational amenities;
- The opportunity to provide housing in a general location which is already considered acceptable for housing by the Local Planning Authority;
- The opportunity to support local shops and services through the provision of new housing;
- Opportunity to retain views across the north western corner of the site towards the Surrey Hills.

**Constraints-**

- The presence of the site within a designated Green Belt;
- The importance of retaining views across the north western corner of the site towards the Surrey Hills;
- The presence of two listed buildings within the site’s boundaries, albeit towards the periphery of the site;
- The presence of a 400m Special Protection Area buffer zone related to Whitmore Common;
- The need to respect the residential amenity of existing residents on Gravetts Lane through consideration of proposed orientation and siting of buildings.

**Development proposals**

There exists significant potential for an extension to the existing proposed housing allocation north of Keens Lane in the southern portion of the site.

There also exists potential for residential development in the southern half of the western portion of the site which is less visually exposed and lies adjacent to existing residential development on Gravetts Lane.

Beyond the existing proposed allocation, it is considered there is reasoned justification (supported by landscape analysis) for somewhere in the region of 348 dwellings which would be accessed from either Keens Lane, south of the site, or from Gravetts Lane at the centre of the site’s southern boundary which currently provides access to the equestrian uses, positioned centrally within the site.
Housing in this location would lie beyond the 400m buffer zone for the Whitmoor Common SPA and SSSI and would avoid encroachment into the more visually exposed north western corner of the site.

The site also provides the opportunity for the provision of a sizeable area of open space which could form Suitable Accessible Natural Green Space (SANG).

The laying out of open space in the northern portion of the site would allow connections between the proposed housing and the existing public rights of way and heathland north east of the site.

Within the development envelope and layout, consideration has been given to the existing vegetation (including trees, hedgerows, hedgerow trees and small copses and belts of woodland). These landscape elements have been retained (see below) as part of the preliminary landscape strategy and therefore can be integrated into the layout of a more detailed masterplan in the future. More detail on the landscape potential of the site is provided within the accompanying Landscape Report.

Summary

These proposals have the following advantages:

- They respond to the Council’s proposed allocation of Site A22;
- They create additional, public open space next to the urban area where accessible open space is in short supply;
- They provide SANG protection for effective mitigation of impacts on the SPA of the Council’s proposed site allocations A22, within close proximity;
- They respect physical constraints, including the setting of listed buildings and the long, open view southward towards the North Downs from Worplesdon Road;
- They maintain natural boundaries for the Green Belt, including the brook and its associated vegetation; and
- They provide additional opportunities for housing on the urban edge, within reach of facilities including schools, health services, public transport and local shops.

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

Attached documents: BRS.5358_A_PLANNING_SUBMISSION (ALC) LR.PDF (4.2 MB)

Comment ID: PSLPS16/7968  Respondent: 8977025 / Sustainable Land PLC  Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

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

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

Introduction

OVERVIEW

This report sets out an appraisal of the landscape and visual constraints and opportunities in respect of potential residential led development on the land to the north-west of Guildford, Surrey (Figure 1).
This preliminary landscape and visual appraisal (LVA) aims to determine the various landscape and visual constraints and opportunities of the promoted site, utilise the analysis to outline the landscape and green infrastructure strategy, and define a logical, rational and defensible boundary between the promoted site and its surrounding landscape context. This will be reviewed in the context of the landscape character and visual amenity of the local area.

Field work was carried out in July and August 2014 to review the existing landscape baseline and character of the area and its setting. This document summarises the appraisal and is supported by a series of figures to illustrate the analysis. A series of representative photographic views have been used to inform and illustrate the description of landscape character and the visual setting of the area.

Where applicable, the concept and procedures set out the Guidelines for Landscape and Visual Impact Assessment (3rd Edition, April 2013) have been adopted.

OVERVIEW OF POLICY & GREEN BELT

The Guildford Borough Local Plan was adopted in 2003, and the saved policies remain in effect under the direction given by Secretary of State in 2007.

The Local Plan 2003 will be replaced by the new Local Plan which is currently under consultation. The new Local Plan will set out the vision for the borough for growth and development up to 2031.

The promoted site and wider area is currently included in the Green Belt of Guildford Borough, the extent of which is currently under review as part of the preparation of the new Local Plan for the Borough.

Policy Context for Landscape and Visual Matters

EUROPEAN LANDSCAPE CONVENTION

The European Landscape Convention (ELC) promotes the protection, management and planning of European landscapes. The convention was adopted on 20 October 2000 and came into force on 1 March 2004. The ELC is designed to achieve improved approaches to the planning, management and protection of landscapes and defines landscape as:

“...an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”

The importance of this definition is that it focuses on landscape as a resource in its own right and moves beyond the idea that landscapes are only a matter of aesthetics and visual amenity.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and provides a framework within which the appropriate local council can produce local and neighbourhood plans; the NPPF is a material consideration in planning decisions.

The NPPF sets out three dimensions to achieving sustainable development that include economic, social and environmental considerations. It places an onus on the planning system to perform a role in relation to the environment that ‘contributes to the protection and enhancement of our natural, built and historic environment’ and this underpins the strategic guidance set out in the NPPF in relation to landscape and visual matters.

High quality design and local character are repeating themes through the core planning principles and more specific guidance on delivering sustainable development. Specific issues addressed by the core principles of the NPPF include:

- that decision making should secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- that decision making should take account of the different roles and character of different areas and recognise the intrinsic character and beauty of the countryside and supporting thriving rural communities within it (this also reflects the aims of the ELC); and
that development should contribute to conserving and enhancing the natural environment.

Under delivering sustainable development the guidance sets out a series of considerations relating to ‘good design’. This includes reference to sense of place, responding to local character and materials and aiming for visually attractive solutions and appropriate landscaping.

The NPPF notes the importance that designs ‘evolve’ in response to local issues and to the views of local communities and also sets out principles in relation to conservation and enhancement of the natural environment.

In relation to Green Belt the NPPF states:

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

Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

PLANNING PRACTICE GUIDANCE

In March 2014 the Department for Communities and Local Government (DCLG) launched a web based resource of planning practice guidance documents (PPG); these effectively supersede a series of previous advice and guidance documents.

Matters pertaining to ‘landscape’ are covered under the guidance for the Natural Environment. Para 001 addresses how the character of landscapes can be assessed to inform plan-making and planning decisions. It states that:

“One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.

Where appropriate, landscape character assessments should be prepared to complement Natural England’s National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making.”

The NPPF and PPG interpret landscape character as a key tool which can be used in plan making and decision taking.

This preliminary LVA includes reference to landscape character assessment prepared at a national, regional and local level and also addresses the key characteristics of the site an its immediate context and therefore responds fully to the requirement of the PPG.

With regard to open space and green infrastructure, in paragraph 001 of the Open space, sports and recreation facilities, public rights of way and local green space section, the PPG states that:

“...it [open space] can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure as well as being an important part of the landscape and setting of built development...”

The Design section (paragraph 007) of the guidance states that planning should promote local character including landscape setting. It considers that:

“Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging
appropriate innovation. The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre."

It also states that:
"When thinking about new development the site’s land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process."

Site Description and Context

LOCATION

The site is located on the north-west settlement edge of Guildford, covering the area of approximate 47.4 hectares (ha). Worplesdon Road (A322) defines the eastern and northern boundary of the site before the road turns toward the village Worplesdon (Figure 1). The southern boundary of the site is partly formed by Keens Lane and partly bordered with the rear gardens of a number of semi-detached properties along Gravetts Lane. A local watercourse with its associated vegetation forms the majority of the western site boundary, with the remaining short northern section of the western boundary defined by an existing belt of trees. Tangle Lane crosses the site from north to south connecting Worplesdon Road with Keens Lane and Gravetts Lane. A public right of way (public bridleway) connects Worplesdon Road to Chitty’s Common, passing across the south-east corner of the site.

CURRENT SITE USE

The site is mostly occupied by small to medium irregular shaped fields, which are bounded by thin hedgerows and trees, and used for pasture with some horse or sheep grazing. Several large residential properties and Worplesdon View Care Home are located along Worplesdon Road in the eastern and northern part of the site, set back in large plots. A small public open space lies along Worplesdon Road close to the south-east corner of the site with the public bridleway connecting Worplesdon Road to Keens Lane.

SETTLEMENT

Three main settlement areas are located close to the promoted site. To the immediate south-east lies the residential edge of Stoughton, comprising a variety of 20th century housing with landscaped gardens. Some commercial buildings also appear on the east side of Worplesdon Road within this residential area (such as a local car dealership). The village of Worplesdon is located c. 400m to the north-west of the site. A large part of the village is designated as conservation area and the village contains several listed buildings. The largest village settlement closeby is Fairlands situated c. 500m to closest point of the western boundary of the site. Aldershot Road (A323) flows along the north-east edge of Fairlands and provides a physical barrier between the Fairlands and the site. The building style of this village is typically 20th century pitched roof houses with landscaped gardens both in the front and back. A small village green is located in the central area and there are a variety of verges along the roads or streets. The settlement is well connected to the adjacent green space by public footpath. Holly Lane links Worplesdon with Fairland along this route; there are also several clusters of residential properties. A well-managed golf course (Rokers Golf Course) aligns with the A323 between Holly Lane and Gravetts Lane close to the western site boundary.

DESIGNATIONS

The site is located within an area currently designated as Green Belt. The extent of the Green Belt in this area is currently under review as part of the new Local Plan. Figure 1 shows the landscape related planning designations that are relevant to the site and surrounding area.

The designation closest to the site is Whitmoor Common, which is protected by Thames Basin Heaths Special Protection Area (SPA), designated as Site of Special Scientific Interest (SSSI) and also Local Nature Reserve. Part of the site falls within the 400m buffer of the SPA with the remaining area located within the 400m-5km zone.
The Surrey Hills Area of Outstanding Natural Beauty (AONB) is located over 3.5km to the south of the site. However due to the combined effect of distance, landform and vegetation cover, including the nature of the surrounding settlement pattern, there are not likely to be any impacts on this designated area.

Landscape and Visual Analysis

LANDSCAPE RESOURCES

Topography

The highest area (c. +45m AOD) of the site lies across the corner formed by Keens Lane and Tangleley Lane and extends to Tangleley Place Farm in the centre of the site. A small area close Keens Lane and Gravetts Lane reaches +50m AOD and forms the highest point of the site. From here the landform generally falls towards south to Gravetts Lane, west to the watercourse and north to Worplesdon Road. The northern part of the site is relatively flat with the ground level below c. +40m AOD.

In the wider context, the site is located on the south-east side of the lowland valley situated between the settlements of Stoughton and Worplesdon. The watercourse running along the western site boundary forms the lowest part this lowland valley and creates a natural barrier that contributes to the separation between the site and the landscape setting to the west (Figure 3, Topography).

Watercourses

The site is marked by several watercourses and ponds. The longest watercourse is the one forming the western edge of the site. It’s mostly well vegetated except a small section in the middle. The Flood Map for Planning on Environment Agency’s website shows the Flood Zone 2 & 3 is associated with this watercourse. There are three large ponds placed in the eastern part of the site covered by the dense vegetation. Some field ditches also appear in this part making connections between the ponds.

Public Rights of Way

There is one public right of way (PRoW) which crosses the site; this is a public bridleway, located on the south-east corner of the site which links Worplesdon Road south-west toward Chitty’s Common.

In the surrounding area the network of public rights of way comprises a range of footpaths, bridleways and occasional by-ways which connect the various fringes of the urban area to adjacent open spaces and the green infrastructure network. To the north-east of the site Whitmoor Common is accessible via a number of PRoW, and to the south-east several footpaths cross an area of common adjacent to Fairlands.

Vegetation

Vegetation on site consists of pastures, field boundary vegetation, and small groups of trees and woodland. Hedgerows vary in height, degree of management and age. Large mature trees are sparse along the field bound-aries, individually or as groups. Small woodland areas are located at the north-east corner of the site and pro vide green infrastructure connections to the neighbouring Whitmoor Common. A belt of trees located along Keens Lane links to the adjacent Chitty’s Common. Generally, tree coverage is much higher on the eastern part of the site providing a continuous vegetated corridor connecting Whitmoor Common and Chitty’s Common.

In the wider context, vegetation in the rural landscape to the immediate south and west of the site is similar to that on site. Vegetation in the Whitmoor Common to the north-east of the site shows a much denser approach. The vegetation in Rokers Golf Course is in its early years of establishment and under the layout of the golf course it offers a completely different pattern.

Roads tend to be edged by woodland in general and due to the extent of this network there is a strong framework of trees and woodland which characterise the area.
LANDSCAPE CHARACTER

The site and its wider setting coincide with areas of landscape described under the following existing character assessments as shown on Figure 4, Landscape Character.

National Character Area (NCA) – Natural England (February 2013)
- NCA 129: Thames Basin Heaths
- NCA 114: Thames Basin Lowland

The future of Surrey’s landscape and woodlands – Surrey County Council (1997)
- Thames Basin Heaths – Western Surrey
- Thames Basin Lowlands - Wanborough

Guildford Landscape Character Assessment & Guidance - Guildford Borough Council (January 2007)
Volume 1 Rural Assessment
Landscape Type (1:50,000)
- E Wooded Rolling Clayland
- G Wooded and Settled Sandy Heaths
- Character Area (1:25,000)
  - E1 Wanborough Wooded Rolling Claylands
  - G1 Worplesdon Wooded and Settled Sandy Heaths

Volume 2 Rural-Urban Fringe Assessment Rural-Urban Fringe Character Area (1:10,000)
- E1 Rydeshill-Fairlands Rural Urban Fringe
- G1 Worplesdon Rural-Urban Fringe

National Landscape Character

NCA 129 Thames Basin Heaths

Key characteristics:
- High woodland cover;
- Small to medium-sized fields with woods;
- Mainly pasture land, with a mix of uses including forestry, golf course and horse paddocks;
- Historic commons offer tranquillity and unenclosed views; and
- Valley floors are wet with ditches, numerous watercourses, ponds.

NCA 114 Thames Basin Lowland

Key characteristics:
- Gently undulating lowlands and flat valley plains
- A pastoral landscape interspersed with woodland and shaws, hedgerows and trees, remnant commons, villages and farmsteads;
- Fragmentised farmland character;
- Sparse settlement; and
- Numerous major road and rail networks criss-cross the area.

Regional Landscape Character

Thames Basin Heaths – Western Surrey
A low lying, undulating, extensive scale landscape with dense tree cover, heathland and pockets of small scale farmland.
Key characteristics:

- Open expanses of heathland, often enclosed by woodland, allow exhilarating views;
- Low density housing with large established gardens, golf courses and parkland; and
- Small fields are enclosed by low hedges or tall lines of trees and shrubs.

Thames Basin Lowlands – Wanborough
A gently rolling, open, medium scale farmed landscape with few woodlands.

Key characteristics:

- Small to medium size irregularly shaped fields are divided by a mixture of low and tall hedges;
- Field trees mark the lines of old hedges; and
- Settlements are small and scattered with a few small pockets of suburbia.

Local Landscape Character

Guildford Landscape Character Assessment & Guidance - Guildford Borough Council (January 2007)

Landscape Type E Wooded Rolling Claylands

Key characteristics:

- Gently rolling lowland;
- A mix of land uses with pastoral farmland, woodland and historic parkland; and
- Varied sized settlements from scattered farmsteads and small villages, to substantial areas of large 20th
dwellings.

Landscape Type G: Wooded and Settled Sand Heath

Key characteristics:

- Gently rolling landscape;
- Frequent commons, large woodland create an enclosed landscape with glimpses to pastures;
- Scattered settlement; and
- An intimate, sometimes hidden landscape with views framed by woodland.

Landscape Character Area E1 Rydeshill – Fairlands Rural-Urban Fringe
The site is located within this character area. The character area covers the rural urban fringe west of Guildford extending from the Royal Surrey Hospital site and Rydeshill on the urban edge, encompassing the small commons that characterise the landscape to the west of Guildford and the satellite suburb of Fairlands.

Key characteristics:

- Relatively level, flat landscape and cannot generally be perceived from within the urban area;
- Small fields, bounded by thin hedgerows and fences predominantly;
- A range of smaller scale mixed land uses including small holdings, nursery gardens and rifle range form a variable urban fringe landscape on the edge to the east of Tangle Lane;
- Linear red brick development alongside road facing directly onto the commons or greens;
- Some large farm complexes and occasional grander old houses;
- The small fingers of common land such as Chitty’s Common extend into the urban fabric; and
- The transition from rural landscape to the residential development is marked by back garden boundaries, which abut directly onto the common land and or farmland.
Landscape Character Area G1 Worplesdon Rural-Urban Fringe

The Worplesden Sandy Heaths form a distinct landscape to the north west of Guildford comprising a mosaic of heath and wooded common land interspersed with areas of pasture and horse grazing.

Key characteristics:

- Low-lying topography;
- mixed land cover mosaic of scrub, heath and woodland
- Whitmoor Common SPA – internationally important habitats;
- The commons joining the urban area provide a rapid physical and visual transition between town and country;
- and
- The buildings are typical of common edge settlement.

VISUAL ANALYSIS

This section provides a brief description of the nature and extent of the existing views from, towards and between the site and the surrounding area. It makes reference to a series of representative photographic viewpoints, the locations of which are illustrated on Figure 5, Viewpoint Locations & PRoW, with the viewpoints themselves set out on Figure 6, Viewpoint Photographs.

Overall, views to the site vary due to the combined influence of topography, built form and intervening vegetation. However, in general the site and its context are relatively well contained with views towards it being of short or medium distance. Occasional long distance views are limited and only gained from specific locations.

The sensitivity of visual receptors is based on value attached to a view and also the susceptibility of change. Judgements on the value attached to a view include recognition of formal designations and/or local value. The susceptibility to changes in views is judged based on the activity of people experiencing the view (at any given time or location) and the extent to which their attention would be focused on the view (rather than on the activity being undertaken).

Receptors of the highest sensitivity will include those engaged in outdoor recreation whose attention is likely to be focussed on the landscape, for example public rights of way in the open countryside. Alternatively they may include those receptors where views of the surroundings are an important contributor to the experience and visit, for example tourists and visitors to heritage asset (or other attraction), designated or protected views or receptors with views from dwellings. Receptors of lower sensitivity will include those travelling through the landscape on roads, rail or other transport routes where this involves recognised scenic routes and an awareness of views and visual amenity.

For visual receptors the degree of change is related to the size and scale of change in any given viewpoint due to the extent of loss, addition or alteration of features, the changes to the composition of the view including the proportion of the view occupied by the proposal, the degree of contrast and the nature of the experience. The geographical extent in relation to the angle, distance and extent of visibility and the duration of impacts also contributes to the degree of change.

The western part of the site is the most exposed with both short and middle distance views possible from properties along Holly Lane and Gravetts Lane. this includes receptors engaged in outdoor recreation, and vehicle users passing along A323, Holly Lane and Worplesdon Road. The views from properties in the Fairlands settlement are, in general, screened by the vegetation both along A323 and in the surrounding network of fields.

From the south, the majority of views from residential properties, south of Keens Lane toward the site are screened by the tall vegetation along Keens Lane and the houses on Gravetts Lane. People living on Gravetts Lane with the aspect of the rear garden facing the site boundary are likely to have clear views to the site. However the visibility of the site, when travelling along the roads, is generally screened by the built form and vegetation.

From the east, the visual envelope of the site is contained by the urban edge of Guildford at Stoughton, including the tree belts along the Worpleston Road.

From the north, the small woodland at north-east corner of the site restricts the views toward the site from vehicle user and people walking along Worplesdon Road. However, as the landform drops down and fewer trees planted, the views to the site are open up when approaching the north-west corner of the site. These views extend to the long distance and are...
possibly perceived by residents living in the property opposite, people walking along the footpath, and vehicles travelling along Worplesdon Road. Although Worplesdon is situated on a much higher ground (c. +60m AOD) compared to the site, potential views to the site are very restricted due to the large woodland block in-between and varied vegetations throughout.

Some possible locations of obtaining long distance views have also been visited including the some public footpaths to the north of A31 in the Surrey Hills AONB. However the site is hardly visible from those locations due to the combined effect of distance, topography and vegetation.

**Potential Landscape and Visual Impacts**

**THE DEVELOPMENT**

The site being promoted comprises an area of land to the north-west of Guildford. The site is located to the west and south of the A322 as it curves through the area connecting Guildford to Worplesdon, to the north of Keens Lane and Gravetts Lane and to the east of a local watercourse which flows between Rydes Hill and Broadstreet Common (at Fairlands) and Whitmoor Common (to the north-east of the A322).

Development of the site is likely to include a residentially led master plan for development of mixed housing, new highways infrastructure (including internal road layouts and access) along with a network of green infrastructure and open spaces incorporating pedestrian and cycle linkages, community sports provision, formal and informal children’s play, strategic landscaping and sustainable drainage systems. In this location there will also be a requirement for the provision of suitable alternative natural green space (SANGs) which will form an integral part of the proposals for the promoted site and would create improved access opportunities to areas of countryside, which would not currently be available for public access.

**LANDSCAPE VALUE AND SUSCEPTIBILITY**

Although the countryside has some intrinsic sensitivity, when considering landscape and visual impacts, the sensitivity of a landscape is specific to the location in question (in terms of value) and also to the particular project or development that is being proposed (in terms of the susceptibility of a landscape to a specific type of change).

Therefore, in order to understand the likely impacts on a landscape it is necessary to look at the specific context of the fringe landscape of Guildford and in relation to potential for residentially led development.

Landscape value is the value attached to a potentially affected landscape. It is relative in relation to the different stakeholders and different parts of society that use or experience a landscape. Although factors such as formal designations are an important component when determining value, other aspects are also considered as part of the judgement process. These include issues related to condition (of features and elements), seclusion, presence of detracting influences and also rarity and the degree of representativeness. Landscape value will vary in response to the specific landscape that is being considered, even where a landscape is included in the boundaries of a formal designation.

Landscape susceptibility is the ability of an area to accommodate change without undue consequences for the maintenance of the baseline situation. In this context, the term landscape receptors can be expanded to cover landscape character areas, the condition of a particular landscape character type or an individual landscape element or feature. Landscape susceptibility will vary in response to the specific landscape that is being considered and to the nature of the type of change that may occur.

The susceptibility of the landscape to residentially led development is determined as an integral part of the appraisal of likely impacts, at a point where the components of a proposed development have been analysed and potential key causes of impact are understood.

**LIKELY KEY IMPACTS**

The baseline section of this appraisal has considered the characteristics and intrinsic sensitivity of the landscape to the north-west of Guildford. The following section sets out a review of the types of impact generating activities that would generally be associated with residentially led development.
Causes of impacts at completion
The permanent components of residentially led development which may give rise to impacts on landscape and visual receptors include:

- The built form of residential development (also incorporating the internal highways layout and hierarchy of streets);
- The resulting increase in the urban area of Guildford, notably to the north-west of the settlement and associated pressure on retained areas of landscape on the urban fringe; and
- Mitigation integrated into the proposed development (i.e. green infrastructure, open space and strategic landscaping), including retained trees, woodland and hedgerows, landscaped attenuation areas, open space provision and new planting.

Consideration of likely impacts
The analysis of likely impacts of residentially led development is used at the initial stages of the design process to in order to shape a suitable development envelope which avoids or minimises the key potential impacts. In the context of the promoted site and its surrounding local landscape character, these judgements can be use to inform the analysis of constraints and opportunities which can then be used to guide the preliminary design stages of a proposal in a positive manner.

The incorporation of mitigation at the earliest stages of the design process will ensure that the promoted site responds to the landscape components of the promoted site and also the local landscape context. This approach works with the positive attributes and identifiable landscape features of the promoted site and will therefore present a logical development envelope and landscape strategy that is physically and visually contained and works to create a clear defensible boundary to the edge of Guildford.

There are likely to be some residual impacts and it is this level of impacts which determines the overall harm, and whether a development is acceptable in landscape and visual terms.

Landscape and Visual Constraints and Opportunities

OVERVIEW
The following section sets out an analysis of the constraints and opportunities related to the promoted site. This will then be used to formulate a landscape strategy and development envelope. The approach ensures that potential landscape and visual impacts are minimised and demonstrates how the promoted site can deliver a robust and defensible edge to the Green Belt in relation to the settlement limit of Guildford and in a manner which responds to local landscape character.

LANDSCAPE AND VISUAL CONSTRAINTS

- Part of the promoted site sits at a localised topographical high point, rising from c. +36m at Worplesdon Road to +50m AOD at Keens Lane and Gravetts Lane. In the immediate context, the promoted site sits above a shallow valley formed by the nearby watercourse;
- The existing nearby watercourse which forms a delineating physical landscape feature through the area between Guildford and Fairlands (and also Worplesdon);
- The presence of hedgerows, hedgerow trees and small woodland copses/belts which form the existing green infrastructure framework on the promoted site;
- The presence of a public bridleway to the south-east corner of the promoted site (currently linking Keens Lane and Worplesdon Road);
- Some areas of designated Common Land on and directly adjacent to the promoted site;
- The rural character of some local roads, including Tangley Lane;
- Potential issues of coalescence between the north-western edge of Guildford and the nearby settlements of Worplesdon and Fairlands;
- Some available long distance views to the Surrey Hills AONB from the promoted site and adjacent roads (i.e. views looking south to the rising scarp and ridgeline);
- Proximity of the south-eastern edge of Worplesdon Conservation Area to the north-west of the promoted site and also two Listed Buildings (Tangley Cottage and Pitch Place House) on the promoted site; and
LANDSCAPE AND VISUAL OPPORTUNITIES

In the wider landscape the promoted site sits in the context of a wider shallow valley which rises from c. +40m AOD (in relation to the promoted site) to c. +60m at Worplesdon, to the east of Fairlands and on the existing western edge of Guildford. This increases the potential physical and visual containment of the site, subsequently reducing its susceptibility to development and contributing to capacity;

The proximity of the promoted site to arterial highway routes (including the A322 and A323) which provide opportunities to consider locations for points of access which will avoid impacts on other local roads which are more rural in their character;

Working within the framework of existing green infrastructure on the promoted site to guide the development layout in a manner which responds to local landscape character;

Provision of new green infrastructure links across the promoted site to enhance connectivity in terms of both access and biodiversity, including links between larger areas of designated Common Land to the north and south;

The SPA/SSSI buffer zone and designated Common Land both within and directly adjacent to the promoted site, providing opportunities to focus the landscape strategy for green infrastructure and open spaces around these established areas and promoting connections and links in terms of access and biodiversity;

Utilising the existing physical landscape feature of the nearby watercourse (and associated linear tree belts) to retain and enhance a strong green infrastructure framework on the western edge of the promoted site which will physically and visually contain the promoted site and also represent a clear and defensible boundary to the Green Belt;

Ancient woodland located on the outside edge, adjacent to the boundary of the promoted site, providing opportunities to protect and enhance this landscape feature through additional planting and green infrastructure connections; and

Referencing existing views and view corridors to the distant AONB (Surrey Hills to the south) to guide the extent and layout of the development envelope within the promoted site.

Preliminary Landscape Strategy

THE AIM

The preliminary landscape strategy for the promoted site has been led by landscape character and visual amenity. This has drawn on the preliminary appraisal of landscape and visual impacts and the early identification of constraints and opportunities. It has also drawn on the opportunities and constraints identified for the site but also in the context of the surrounding area.

Mitigation measures are intended to prevent, reduce, remedy or offset adverse effects of a development proposal and these are taken forward through an iterative approach to design and appraisal.

The mitigation measures for the proposed development aim to:

- Conserve and enhance the surrounding landscape character;
- Retain and make best use of existing landscape elements and features;
- Optimise protection and screening for visual amenity receptors; and
- Avoid loss or damage to retained landscape elements and features.

THE PRINCIPLES
It is considered that with an appropriate approach to mitigation and the implementation of a robust landscape and green infrastructure strategy, a scheme for residentially led development on the promoted site will be physically and visually well contained, show clear defensible boundaries and, overall, will be acceptable in landscape and visual terms.

The landscape and green infrastructure strategy for the promoted site (Figure 8) is founded on the following principles:

- Identification of a ‘development envelope’ for the promoted site, the extent of which pays particular attention to the existing landscape features and local landscape character, particularly the strong framework of vegetation which characterises the area and also the nearby watercourse which provides an existing physical landscape feature and suggests a logical and robust edge to the west;
- Proposed retention and enhancement of the existing vegetation on the promoted site, including the hedgerow field boundaries and small copses and belts of woodland and, in particular, building on the linear belt of trees and woodland which follows the alignment of the nearby watercourse;
- Creation of additional vegetation infrastructure on the promoted site, taking into account visual containment and mitigation that is both consistent with, and complementary to, the existing local landscape character in terms of scale, disposition and species mix;
- Consideration of the landscape designations across the promoted site and its immediate landscape context, including the setting of Worplesdon and the Conservation Area, Common Land, nearby ancient woodland and ecological buffer’s which all contribute to the formation of green infrastructure and open space as an integral part of the promoted site; and
- The retention and enhancement of a robust and defensible boundary on the western edge of the promoted site, formed by the existing physical landscape feature of the watercourse and associated tree belts and augmented by additional green infrastructure and open space.

THE APPROACH

Development envelope and layout

The development envelope for the promoted site pays particular attention to a number of landscape related constraints and opportunities; this includes the internal vegetation structure of hedgerows and hedgerow trees and the opportunity to retain long distance vistas from the promoted site (and from the A322 further north) toward the ridgeline of the Surrey Hills AONB. The development envelope has also incorporated areas of Common Land. Whilst the SPA/SSSI buffer is predominantly an ecological designation, this has the benefit of restricting the development envelope to the north of the site and providing additional offset to the south-east corner of Worplesdon Conservation Area.

A key matter for defining the limits of the development envelop is the creation of a robust western boundary to the promoted site. This is formed by the alignment of the watercourse and associated linear tree belts. This existing physical landscape feature has then been augmented through proposals for additional green infrastructure and open space which further restricts the western edge of the development envelope to ensure that the boundary to the promoted site is robust and defensible in the long term. This approach also ensures that there is physical and visual containment of the promoted site on its western edge to balance that provided by existing green infrastructure and settlement to the south, east and north.

This approach ensures that at the outset of the design process the constraints and opportunities which are specific to the site and surrounding context are considered and addressed by the design process. This in turn promotes a better quality of design and a scheme which can develop in a way that responds to local landscape character.

Existing vegetation strategy

Within the development envelope and layout, consideration has been given to the existing vegetation (including trees, hedgerows, hedgerow trees and small copses and belts of woodland). These landscape elements have been retained as part of the preliminary landscape strategy and therefore can be integrated into the layout of a more detailed masterplan in the future. This includes the orientation and layout of residential plots in a manner where landscaped elements can be incorporated into the garden space, boundaries, green infrastructure or open spaces. This approach includes appropriate stand offs to trees and hedgerows which will help to avoid potential impacts on root protection zones of these elements during construction activity in the future.
In some instances, these existing landscape elements will be reinforced and enhanced through additional landscaping and improved management; the aims of which will consider location, function and also biodiversity objectives.

**Green infrastructure and open space**

Green infrastructure and open space has guided the formation and extent of the development envelope. The retained areas of green infrastructure ensure that the built form of the proposed development will be contained in a robust and diverse framework of open spaces. The strategy for retaining existing vegetation combined with proposals for extensive landscaping will provide a range of green infrastructure at differing stages of establishment and maturity which will enhance the quality of the proposed development and also help to integrate the site into the local landscape character.

At detailed design the selection of species for trees and woodland will refer to native species and as well as those present in the context of the local landscape character.

**Summary and conclusions**

This appraisal has been prepared with reference to a parcel of landscape located to the north-west edge of Guildford; this area has been identified as a potentially suitable location for sustainable residential development (the promoted site). In order to determine the suitability of the promoted site to accommodate residentially led development, the appraisal has identified the landscape and visual constraints and opportunities which are present on the promoted site and in its immediate surrounding landscape context.

The appraisal has addressed the following landscape resources and visual receptors:

- Landscape character, including physical landscape features and elements; and
- Views and visual amenity experienced by residents, recreational users (including visitors and tourists) and road users.

The promoted site is not subject to any specific landscape designations; however there are a number of formal designations which have landscape associations. This includes the presence of registered Common Land both on and adjacent to the promoted site, two Listed Buildings (on site) and a Conservation Area (at Worplesdon). There is an area of ancient woodland located adjacent to, but out with, the north-western boundary of the proposed site and also the north-eastern area of the promoted site is included within a 400m buffer to a SSSI (Whitmoor Common) and an SPA (Thames Basin Heaths).

Overall, the promoted site and wider area is currently included in the Green Belt of Guildford Borough, the extent of which is currently under review as part of the preparation of the new Local Plan for the Borough.

There is comprehensive coverage of landscape character at a regional and local level by published landscape character studies. At a local level the site is located in the Wooded Rolling Claylands (LCT) and Wanborough Wooded Rolling Claylands (LCA), the key characteristics and landscape guidelines of which have also been used to inform the constraints and opportunities and subsequent landscape strategy.

The promoted site is well contained both physically and visually. Notwithstanding the small, localised high points of the landform north of Keens Road and west of Tangley Lane, the overall topographical characteristic of the area is that of a shallow valley, falling from the surrounding landscape areas to the east (Guildford) and west (Fairlands) and north (Worplesdon) toward the shallow valley formation and local watercourse which flows between Broadstreet Common and Whitmoor Common.

Combined with the close proximity and links to the existing urban form of Guildford (to the east and south) and the mosaic of vegetation cover present along the road network and nearby smaller settlements the visual envelope is well contained. There are some distant views from the promoted site to the wider landscape however these are specific, channelled vistas and from the wider landscape, the promoted site is not prominent in views.

A number of constraints and opportunities have been identified on the promoted site. Along with an analysis of the type of development which would be proposed and identification of likely landscape and visual impacts which are likely to occur,
these have been used to develop a preliminary landscape strategy. This includes a robust strategy for green infrastructure, open space and strategic landscaping.

The main purposes of Green Belt aim to check unrestricted urban sprawl, prevent the merging of neighbouring towns, safeguard the countryside from encroachment and preserve the setting of historic towns. The preliminary landscape strategy for the promoted site has responded to the constraints and opportunities presented by physical landscape components, landscape character and visual amenity of the surrounding area.

From this analysis the inclusion of a robust buffer along the western edge of the promoted site has evolved. This buffer is concentrated on the existing physical landscape feature of the watercourse and its associated vegetation. Along with the constraints on development presented by the stand-off required in the northern area of the promoted site (largely driven by ecological justifications due to the SPA/SSSI designations) this ensures the retention of open, undeveloped land which will prevent the merging of Guildford with Fairlands or Worplesdon. This key principle of the preliminary landscape strategy is supported and augmented through a range of other landscape mitigation measures that would integrate the promoted site with its surroundings and ensure that development proposals are landscape led and integrated with local landscape character.

A development proposal for the promoted site is likely to result in only limited harm at a localised level and limited in the immediate context of the promoted site; therefore the potential landscape and visual effects of such a development proposal are not likely to be significant. As such a landscape led, residential masterplan for the promoted site is likely to be acceptable in landscape and visual terms.

This is based on the positive attributes of the site in its current context, which is closely related to the existing settlement edge of Guildford, the degree of existing enclosure (created by existing urban form, the local road network and green infrastructure) and the opportunity to create a robust and defensible boundary to the Green Belt on the western edge of the promoted site. It is considered that, subject to the incorporation and evolution of the preliminary landscape strategy, it would not be necessary to maintain this edge of Guildford as permanently open and that the promoted site could be brought forward with a development proposal which respects and enhances local landscape character and would not compromise the purpose of the remaining Green Belt areas between Guildford, Fairlands and Worplesdon.

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

Attached documents: BRS.5358_Preliminary LVA Low Res 15072016.pdf (2.6 MB)
The Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements and shows a shortfall in housing land supply in the early years of the plan, including the absence of a five-year supply of housing land.

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

Attached documents:

Comment ID: SQLP16/2004  Respondent: 8977025 / Sustainable Land PLC  Agent: Roger Daniels
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

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

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

Yes
Sustainable Land PLC does not challenge the legal compliance of the Proposed Submission Local Plan

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

Attached documents:

Comment ID: SQLP16/2005  Respondent: 8977025 / Sustainable Land PLC  Agent: Roger Daniels
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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

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

No.
The Local Plan is not sound because of its failure to meet the full objectively-assessed need for housing over the whole of the plan period and its failure to achieve a five-year supply of housing land on adoption of the Local Plan. The Review of Green Belt and Spatial Development Strategy have not been based on giving sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan.

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

Attached documents:

Comment ID: SQLP16/2006  Respondent: 8977025 / Sustainable Land PLC  Agent: Roger Daniels
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
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<td>The Local Plan has not demonstrated compliance with the Duty to Co-operate. The SHMA Briefing Note says that the strategy’s link with housing needs in adjacent local authorities ‘will be explored as part of ongoing work’. There should be evidence that the duty has been discharged, including consideration of unmet housing requirements in neighbouring local authority areas.</td>
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We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

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

Attached documents:

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Comment ID: pslp172/1141  Respondent: 8978273 / Robert Mackie  Agent:

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

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

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

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

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

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

Attached documents:

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Comment ID: pslp172/1452  Respondent: 8978337 / Valerie Davis  Agent:

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

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

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

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

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

Attached documents:

Comment ID: pslp172/1451  Respondent: 8978369 / Paul Davis  Agent:

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/2869  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

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

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

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

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

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

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

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

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

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</table>
I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

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

Attached documents:

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

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

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

Attached documents:

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

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

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

Attached documents:
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

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

Attached documents:

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Comment ID: PSLPP16/11965  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

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

Attached documents:

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Comment ID: PSLPP16/11970  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

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

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

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

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

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

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

Attached documents:

---

Comment ID: PSLPP16/11969  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health

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

Attached documents:

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Comment ID: PSLPP16/11963  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

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

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

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

Attached documents:

Comment ID: PSLPP16/11966  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

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

Attached documents:

Comment ID: PSLPP16/11962  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/11967  Respondent: 8979265 / Rachel Taylor  Agent:

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

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

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

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

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

Attached documents:

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Comment ID: pslp172/435  Respondent: 8979841 / Sally Trickett  Agent:

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

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

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

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

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

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

I object that, unlike other places, Guildford is choosing not to constrain its overall growth. Expansion should be constrained to protect the character of the town.

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

Attached documents:

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Comment ID: PSLPA16/3774  
Respondent: 8979969 / Robin Bowen  
Agent:  

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

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

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

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Comment ID: PSLPS16/7114  
Respondent: 8979969 / Robin Bowen  
Agent:  

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

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

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

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Comment ID: PSLPP16/15959  
Respondent: 8979969 / Robin Bowen  
Agent:  

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

I object to the expansion of Guildford along the A3 and in particular the development of 200 homes on Gosden Hill by Burpham allowing Green belt development to pay for transport schemes will simply generate more traffic from more homes fuelling congestion in an already over stretched area. indeed, if one factors in the additional traffic from major development sites coming in on the Epsom and London roads the result will be chaos. Roads such as York road will become even busier due to other central routes being closed to through traffic, pedestrianised or used for development.

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

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

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

I believe the transport requirements have not been thought through as it is my understanding that even if all the proposed highway improvements in the plan were built congestion would not improve and we would have a lot more people stuck in traffic with nowhere to go.

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

Attached documents:

Comment ID: PSLPP16/15957  Respondent: 8979969 / Robin Bowen  Agent:

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

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

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

I object to the proposal to inset (remove) Send, Ripley, Clandon and Horsley from the Green Belt If this were to be allowed it would defeat the whole purpose of the Green Belt principle and would lead to yet more development in due course as there will no longer be any requirement for a developer to show there “special circumstances “to allow an application for development in the Green belt.

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

Attached documents:

Comment ID: PSLPP16/15958  Respondent: 8979969 / Robin Bowen  Agent:

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

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

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

I object to the proposals for Guildford as I believe the proposals as drafted would change Guildford’s character forever.

I believe the assessment used by the council to identify housing need and to justify growth on such a scale, is fundamentally flawed and exaggerates need very significantly even before one takes into account the implication of the vote to leave the EEC. I thus object to its use and I support the Guildford Residents Association response (GRA) and oppose Guildford being expanded by one quarter. I also support the views of Cranley Road
I object that brownfield opportunities are being ignored we need homes in the centre of town not 40% more shops.

I object to the plan being put forward to an inspector at this stage as I do not believe it is ready for this Similarly I believe the transport evidence is not fit for use. As there are major transport issues unresolved such as another river crossing or a central bus facility.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/612</th>
<th>Respondent: 8980929 / Angela Williams</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

**Attached documents:**

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<thead>
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<th>Comment ID: PSLPS16/610</th>
<th>Respondent: 8980929 / Angela Williams</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

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

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- result in rat-running through local roads
- add to Guildford's pollution.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1921  Respondent: 8983393 / Ingrid Londei  Agent:

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

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

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

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- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/4952  Respondent: 8984097 / Richard Beeston  Agent:

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

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

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

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

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

Page 198 of 3142
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4841  Respondent: 8985633 / Jean Millier  Agent:

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

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

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

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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/4047  Respondent: 8986433 / A Millard  Agent:

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

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

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

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

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- result in rat-running through local roads

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Page 200 of 3142
add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/404  Respondent: 8987553 / L Wainhouse  Agent:

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

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

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

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPA16/1242  Respondent: 8988353 / Fenella Harrison  Agent:

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

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

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

We have been without internet for three days now: I am reduced to having to Send this 'snailmail'.

I object most strongly to the content of this new local plan.

I have lived in the A.O.N.B of West Horsley parish for over 32 years and have special knowledge of the area.

I have read the objections of West Horsley Parish Council to the plan, and those of the Horsley countryside preservation society (H.C.P.S) most carefully and fully endorse them. I shall not repeat all their well grounded objections here.

West Horsley is an ancient, rural village in London's Green Belt, with two attractive pubs and an ancient network of public
rights of way, enjoyed by outsiders. It also has over 40 listed buildings. Most councillors and planners will be completely oblivious to the amenity value of the whole village.

Beatrix Potter, the children's Peter Rabbit author, frequently stayed where I live with her favourite uncle, Sir Henry Roscoe and his wife Lucy Potter. The latter, gave the land to build West Horsley's village (see the plaque there). A huge number of tourists and visitors (and horses and cyclists) pass through this lovelace farming hamlet at 600 up. I often stop them. Nearly always they have come up here from the village itself, the railway stations or the sheepleas. Situated as it is between Horsley Railway station to the east and East Clandon to the west, our village is a vital gateway to the Surrey Hills Area of Outstanding Natural Beauty.

Look at any road map and your will see the largely uninhabited area between the A246 to the north and the A25 to the south: West Horsley leads to it.

This is exactly what the Green Belt is for: for the enjoyment of others. It is not pure Nimbyism which leads to the general outrage with which G.B.C's ignorant proposals have met.

Though now conservative councillors can in all conscience vote against the Green Belt, and in favour of "insetting" is a mystery. It seems to me that the top echelons of GBC are in thrall to developers, land speculators and all while the main body of decent councillors have become mindless sheep. Will GBC be back in Private Eye etc as a rotten borough? I hope not.

Now that West Horsley is to be the site of a prestigious opera house (Grange Park) at West Horsley place- landed even by the Head of S.C.C- surely it is not right to fill up this village with 35% more homes?

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

Attached documents:

Comment ID: PSLPS16/4285  Respondent: 8990721 / Andrew herzig  Agent:

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

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

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

Having lived in Guildford almost all my life, I am very concerned that the infrastructure of the roads into Guildford, especially from the Hogs Back, would not cope with the extra traffic generated by this proposed very large development. Currently, the A3 through Guildford is busy and, with existing junctions and traffic volume, can quickly become a huge bottleneck during the rush hour, especially if there is a breakdown or accident anywhere in the vicinity. The large housing development proposed, with resultant extra cars, delivery vehicles etc. would inevitably substantially increase the traffic volume, thereby further slowing the traffic flow for everyone using these already congested roads for commuting to and from work especially.

The planned access to the new development from the A31 is supposedly partly to relieve pressure on the existing A3 junction at Tescos, but with the scale of the planned housing development and extension of the business park, I can only foresee that the proposed junction with the A31 will create another unpleasant traffic bottleneck in addition to the existing one.
I therefore believe that development of this particular site can only be detrimental to the already overstretched road network of our borough and I am strongly opposed to it.

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

Attached documents:

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Comment ID: PSLPS16/5696   Respondent: 8990721 / Andrew herzig   Agent:

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

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

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

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I am writing to express my opposition to this proposed development on environmental and aesthetic grounds. As nature lovers and walkers, my wife and I regularly walk from the back of our house in Applegarth Avenue and within 5/10 minutes, we are walking around the fields which have been earmarked for this proposed development, admiring the extensive views up towards the Hogs Back. Apart from the fantastic sense of open space, far-reaching views in all directions, and peace and quiet, the area is home to a large variety of birds (some on the endangered list – yellowhammers, little owls, curlews and skylarks) and other wildlife.

It seems madness to me to destroy this rare downland wildlife habitat and beautiful environment in the Green Belt (and Hogs Back AONB) which is free for all to enjoy, so please seriously consider this in your appraisal of options for housing development in our borough.

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

Attached documents:

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Comment ID: PSLPS16/7007   Respondent: 8990721 / Andrew herzig   Agent:

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

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

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

---

I am writing to object to the proposal to build a new railway station as part of the larger development plan for the Blackwell Farm site. If a station were built, it seems likely that the footpath running along the back of our properties in Applegarth Avenue would become a very busy station access walkway leading under the existing railway bridge. One of the things which attracted us to move to Applegarth Avenue 15 years ago was the easy, unrestricted on-road parking. Is there any possibility of keeping things that way if we have a new railway station in the immediate vicinity? Nobody in Applegarth Avenue or the surrounding streets wants to see their neighbourhood turned into an extended station carpark.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPS16/5333  **Respondent:** 8991073 / Mark Psyne  **Agent:**

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

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

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

I strongly object to the proposal to develop site A26 Blackwell Farm. This area is greenbelt, boarders and frames the setting for the AONB. Development in this area will cause significant additional congestion on the A31 and A3. This site is unnecessary when others in particular brown field areas are available.

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

Attached documents:

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**Comment ID:** PSLPS16/4108  **Respondent:** 8991233 / c Dorman  **Agent:**

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

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

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

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

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:
**Comment ID:** pslp172/4817  **Respondent:** 8991233 / c Dorman  **Agent:**

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

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

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

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- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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**Comment ID:** PSLPS16/4106  **Respondent:** 8991393 / Helen Dorman  **Agent:**

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

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

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

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

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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**Comment ID:** PSLPS16/4107  **Respondent:** 8991521 / Hannah Dorman  **Agent:**

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

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

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

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

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

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

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

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

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- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPP16/13103  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Policy D2: Sustainable design, construction and energy

I OBJECT to this policy

- The emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available.
- There is an element of “greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable.
- These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

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

Attached documents:

Comment ID: PSLPP16/13105  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Policy D4: Development in urban areas and inset villages

I OBJECT to this policy

In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13107</th>
<th>Respondent:</th>
<th>8993121 / Shelagh Yeomans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td></td>
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</tr>
</tbody>
</table>

Policy E1: Sustainable employment

I OBJECT to this policy

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13109  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

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

Policy E2: Location for new employment floorspace

I OBJECT to this policy

In my opinion all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/13111  Respondent: 8993121 / Shelagh Yeomans  Agent:

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

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

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

Policy E3: Maintaining employment capacity and improving employment floorspace

I OBJECT to this policy.

I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

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

Comment ID: PSLPP16/13113  Respondent: 8993121 / Shelagh Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

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

Policy E7: Guildford Town Centre

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

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

Attached documents:

Comment ID: PSLPP16/13114  Respondent: 8993121 / Shelagh Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

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

Policy H1: Homes for all

I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated. I support high density development in the urban area. On campus dedicated student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13115  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

Policy H2: Affordable homes

I OBJECT to this policy

“Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

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

Attached documents:

Comment ID: PSLPP16/13116  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

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

Policy H3: Rural exception homes

I OBJECT to this policy

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Policy I1: Infrastructure and delivery

I OBJECT to this policy.

- Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

- The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

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

Attached documents:
Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

I OBJECT to this policy.

- This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

- However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

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

Attached documents:

Comment ID: PSLPP16/13119  Respondent: 8993121 / Shelagh Yeomans  Agent:

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

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

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

Policy I3: Sustainable transport for new developments

I OBJECT to this policy.

- The practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

- Large developments outside the town centre cannot maximise sustainable travel. The further from the town centre, the less sustainable the development will be.

- Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

- The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P1: Surrey Hills Area of Outstanding Natural Beauty

I OBJECT to this policy.

Whilst the inclusion of a policy to protect the AONB within its submission draft of the Local Plan is welcome I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

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

Policy P3: Green Belt

I OBJECT to this policy.

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan which welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Policy P5: Thames Basin Heaths Special Protection Area

I OBJECT to this policy.

- This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.
- SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces.
- There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

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

Attached documents:
Policy S2: Planning for the borough – our spatial development strategy

I OBJECT to this policy.

- 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).
- It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated.
- External consultants and members of the public have provided detailed criticisms of the model.
- If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.
- The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860.
- Guildford residents will not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

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

Attached documents:

Comment ID: PSLPP16/17141  Respondent: 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  Agent: The Howard Partnership Trust (Vicky Lochead)

Policy H2 sets out the Council’s proposed policy in relation to seeking Affordable Homes.

The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20160519) states that:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account”.

These circumstances include that:
“Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm”.

The proposed five unit threshold in the Policy is, therefore, not consistent with national policy.

We welcome the recognition in paragraph 4.2.40 of the Local Plan that circumstances may mean that prescribed levels of affordable housing may not be achievable for viability reasons, and that this may require a change in the mix and/or overall levels of affordable housing in a proposal. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

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

Attached documents:

Comment ID: PSLPP16/17139  Respondent: 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  Agent: The Howard Partnership Trust (Vicky Lochead)

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

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

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


Berkeley Homes has a long-term interest in several plots of land in the village of Effingham and have been working with Howard of Effingham School to develop proposals to deliver a new school and much needed new housing for the area. These plans were supported in the Draft Local Plan (2014) but were refused planning permission by Guildford Borough Council in March 2016 and are expected to be considered at an Inquiry in Spring 2017. Given the requirement for those proposals to demonstrate very special circumstances as a departure from policy, we expect the suitability of those plans to be established through the planning inquiry, rather than the Local Plan. Nevertheless, we have some observations on the Proposed Submission Local Plan, which are set out below.

You will be aware that the Local Plan will be tested by the Inspector against the four tests of soundness (National Planning Policy Framework (NPPF) para 182), namely that it is positively prepared, justified, effective and consistent with National Policy. We set out below why we are of the view that the Proposed Submission Local Plan does not meet these tests in relation to the Spatial Strategy (Policy S2), Affordable Homes (Policy H2), the Green Belt (Policy P2), and Infrastructure Delivery (Policy I1).

We understand that Howard of Effingham School will be submitting their own representations on education specific issues relating to Policy I1 on infrastructure delivery.

Policy I1 sets out the Council’s proposed approach to infrastructure delivery and cross-refers to Appendix C which is a schedule of infrastructure items. Infrastructure delivery is regarded as a crucial element of Local Plan making by Government and is one of the five strategic policy areas identified by the NPPF (para 156) that Local Plans should cover, namely:

“the provision of health, security, community and cultural infrastructure and other local facilities”.

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In our view, Policy I1 takes a narrow view of infrastructure provision without providing a proper reasoned justification for the items identified in Appendix C or their relationship to the overall Spatial Strategy for the Borough. Neither the Proposed Submission Local Plan itself nor the supporting documents provide a proper assessment of the potential approaches to infrastructure provision, particularly on education and, as far as we are aware, there has been no work undertaken to identify the deliverability of this infrastructure compared to the site and housing trajectory. Secondary school allocations, for example, now rely almost entirely on the delivery of large strategic sites, which are to be delivered later in the plan period and then over several years.

We are, therefore, of the view that Policy I1 is neither justified, nor effective.

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

Attached documents:

Comment ID: PSLPP16/17142  Respondent: 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  Agent: The Howard Partnership Trust (Vicky Lochead)

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

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

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

The NPPF states that:

"When drawing up or reviewing Green Belt boundaries LPAs should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary” (para. 84).

The NPPF goes on to say that LPAs should:

"satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period” and ”define boundaries clearly, using physical features that are readily recognisable and likely to be permanent” (para. 85).

We agree with the Council’s conclusion that development in and around Guildford’s largest towns will not provide the land needed to meet its OAN. We note that Policy P2, when taken with the policies map and site allocations, establishes the principle of the need for Green Belt release and identifies the areas where it may be appropriate to do so.

We note the review process that the Council has undertaken, through its Green Belt and Countryside Study (GBCS). We do not believe that the additional information produced by the Council since the Draft Local Plan (2014) justifies the changes to site allocations, particularly the removal of the Effingham Sites (Site Allocation 69) which were included in the previous draft. The Sustainability Appraisal inappropriately fails to test the full range of alternative school strategies. We remain of the view that the evidence suggests that the Effingham allocation (Site Allocation 69) was an appropriate Green Belt release and continues to be supported by the Council’s evidence base. When compared with the assessment of the sites now proposed, we regard the revised approach to allocations as inconsistent and not justified against reasonable alternatives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S2 seeks to set out the Council’s strategy for planning positively to meet its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47). In particular, this policy focuses on the Borough-Wide housing target.

In relation to this target, we would note the following:

- The sufficiency of the assessed OAN remains to be established, including in the context of the Local Plan’s obligation to fully address unmet needs in neighbouring authorities;
- The Proposed Submission Local Plan has pushed the plan period back to 2013 to 2033 from 2011 to 2031. Given the significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2031 than is required or was previously planned for;
- The phasing of development in the Proposed Submission Local Plan ‘backloads’ the housing target. The overall housing target is equivalent to 693 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2022/23. It is already generating a significant backlog of housing need with only 242 homes delivered in the last full year for which data is available (2014/15);
- The spatial strategy relies on a smaller number of larger sites which, due to infrastructure and other phasing requirements, are often slow to deliver their targeted number of homes. The accompanying housing topic paper suggests that none of the proposed strategic sites will begin to deliver before 2020/21, with the majority of anticipated provision after 2027. Given the long planning period for such sites, even these targets may be ambitious.

As a result, we are of the view that the currently proposed approach will add to the Council’s backlog, does not plan to meet OAN in any reasonable timescale, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

Neither the Proposed Submission Local Plan itself nor the accompanying reports set out a proper assessment of the alternative approaches to meet the OAN, or the impacts of the very significant changes in site allocations since the previous Draft Local Plan (2014) on doing so. We are, therefore, of the view that the current strategy has not been properly justified.

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Taken as a whole, it is our view that the Proposed Submission Local Plan is fundamentally unsound. At present, the Spatial Strategy and proposed phasing of housing will not deliver Guildford’s Objectively Assessed Need within a reasonable timeframe, if at all. Furthermore, the reliance of the Local Plan on large strategic sites delivered in the latter part of the plan period, for both housing and infrastructure delivery has not been justified against reasonable alternatives. Nor has it been demonstrated to be deliverable and is therefore not effective.

The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown’s Field (Site Allocation 69) to provide homes and an expanded school. This allocation has been removed but in our view remains an appropriate, deliverable and sustainable means of meeting the Borough’s need for new infrastructure and homes.

Our client continues to seek to work constructively with the Borough Council to bring the Effingham site forward and would be happy to discuss any of the above points in more detail.

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

Attached documents:
The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20161116) states that:

"There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account”.

These circumstances include that:

"Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm".

We acknowledge paragraph 4.2.40 of the proposed Local Plan that indicated a level of flexibility when it is demonstrated that the contribution would adversely impact the sites viability. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

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

Attached documents:

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**Comment ID:** pslp171/2743  **Respondent:** 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  **Agent:**

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

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

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

Policy 1D1 sets out the Council's proposed approach to infrastructure delivery.

Neither the Proposed Submission Local Plan itself nor the supporting documents provide a proper assessment of the potential approaches to infrastructure provision, particularly on education and, as far as we are aware, there has been no work undertaken to identify the deliverability of this infrastructure compared to the site and housing trajectory. Secondary school allocations, for example, now rely almost entirely on the delivery of large strategic sites, which are to be delivered later in the plan period and then over several years. We are, therefore, of the view that Policy 101 is neither justified, nor effective.

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

Attached documents:

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**Comment ID:** pslp171/1388  **Respondent:** 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Berkeley Homes has been working alongside Howard of Effingham School for a number of years to deliver much needed housing and a new school to the area. These sites were allocated for development in the Draft Local Plan 2014 but refused planning permission by Guildford Borough Council in March 2016. Consequently, an appeal was lodged against this decision and a public inquiry was held in May 2017. The suitability of the sites has been demonstrated through the inquiry and accordingly, we believe the sites should be included in the Guildford Local Plan as Site's Allocated for Development for the provision of a replacement Howard of Effingham School and up to 295 residential dwellings.

Following the recent appeal decision on land at Long Reach for the provision of a Suitable Alternative Natural Greenspace (SANG), Guildford has the opportunity to release housing sites in that part of the District and allocating the Howard of Effingham/Lodge Farm site would assist in delivering homes in this part of the District, including the provision of much needed affordable housing.

You will be aware that the Local Plan will be tested by the Inspector against the four tests of soundness (National Planning Policy Framework (NPPF) para 182), namely that it is positively prepared, justified, effective and consistent with National Policy. We set out below why we are of the view that the Proposed Submission Local Plan does not meet these tests in relation to the Spatial Strategy (Policy S2), Affordable Homes (Policy H2), the Green Belt (Policy P2), and Infrastructure Delivery (Policy IDl).

**Policy S2: Borough Wide Strategy**

Policy S2 sets out the council's approach to meeting its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47).

The Proposed Submission Local Plan has pushed the plan period back from 2013-2033 to 2015-2034. Given the Borough's significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2033 than is required or was previously planned for.

The phasing of development in the Proposed Submission Local Plan 'backloads' the housing target. The overall housing target is equivalent to 654 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2026/27. It is already generating a significant backlog of housing need with only 388 homes delivered in the last full year for which data is available (2015/16).

The proposed approach does not plan to meet OAN in any reasonable timescale, will add to the Council's backlog, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

The Council will also be aware that from November 2017, authorities that deliver below 85% of the borough's OAN will be expected to plan for an addition 20% buffer on their 5 year plan. Delivery of below 65% from November 2020 the presumption in favour of sustainable development in the National Planning Policy Framework would automatically apply (Housing White Paper 2017).

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

Sufficient, deliverable sites need to be identified to meet this increasing need for housing land, particularly in the east of the Borough, where capacity has been released due to the grant of permission for SANG land at Long Reach.

**Conclusion**

As a whole, the Proposed Submission Local Plan June 2017 is greatly flawed. The currently proposed phasing of housing and spatial strategy will not deliver Guildford's Objectively Assessed Needs within a reasonable timeframe, if at all.

The recently granted SANG at Long Reach also releases housing capacity in this part of the Borough and accordingly, the District wide allocations should be reviewed as a whole to ensure appropriate distribution.

The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown's Field (Site Al location 69) to provide homes and a bigger school. This allocation has
been removed but remains an appropriate, deliverable and sustainable means of meeting the Borough’s need for new infrastructure and homes.

We will continue to seek to work with Guildford Borough Council and Effingham Parish Council to bring forward the delivery of the Effingham sites and are happy to discuss the above points further.

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

**Attached documents:**

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**Comment ID:** pslp172/760  **Respondent:** 8994017 / John Bradford  **Agent:**

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

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

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

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

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

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

**Attached documents:**

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**Comment ID:** pslp172/1790  **Respondent:** 8994209 / Michael Tanner  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

Comment ID:  pslp172/1791  Respondent:  8994273 / Ludmilla Tanner  Agent:

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

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

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

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

Attached documents:

Comment ID:  PSLPP16/11141  Respondent:  8995393 / Caroline Cunliffe  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I am writing in support of the Guildford Residents Associations response to the Local Plan. I oppose the plans to expand Guildford.

I have known Guildford since the early 1970's and have lived here since 1995. During this time the town has become overwhelmed by traffic. Until the traffic problems have been addressed there would appear to be little point in planning for more housing and retail space as there simply isn't the capacity to absorb more cars.

The physical geography of the town combined with its historical character are what make Guildford such an attractive place to live and work. The planned development of Green Belt land for homes will destroy this environment.

There would appear to be a real need for student housing without which our academic institutions will not thrive as appropriate housing for students is essential to their wellbeing whilst living away from home.

With so many shops standing empty, it would seem ill advised to plan for more retail space.

I would hope to see the traffic issues addressed as an absolute priority, followed by sympathetic development to meet identified specific needs. Brownfield sites should be used creatively before any consideration is given to development of farmland.

I oppose the plan and look forward to seeing a solution to the existing traffic problems and the redevelopment of under utilised existing buildings.

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

Attached documents:

Comment ID: PSLPS16/2086  Respondent: 8996641 / Wamadeua Balachandran  Agent:

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

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

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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

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

Attached documents:

Comment ID: pslp172/718  Respondent: 8996641 / Wamadeua Balachandran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:
The level of planned house building of 693 houses up to 2033 seems excessive and no clear explanation of its calculation has been given. Road and rail capacity in Guildford is already insufficient.

As a resident of the Tying area I see the congestion and near miss traffic accidents as well as the regular actual traffic accidents on our narrow lanes which struggle to cope now, larger volumes of traffic will increase the stress to these lanes which are used by Waverley residents as a cut through as well as by Guildford residents. This is an Area of Outstanding Natural Beauty close to Guildford which needs to be protected.

Other borough councils nearby appear to be restricting their overall housing target yet Guildford is not. Surely the beautiful character of our town should be protected?

**Green Belt and Countryside Study**

I oppose the use of Green Belt areas as unjustifiable development areas. All parties promised to 'protect Green Belt' in the election.

The use of brownfield sites should be implemented more..

**Transport Evidence**

Plans to ease congestion and aid flow of traffic in and around Guildford do not yet seem to address all the issues which have been raised such as another river crossing and a central bus facility.

**Guildford Retail and Leisure Study**

Attracting the big names to Guildford High Street is a good thing for the town, but the proposed 40% increase in shops seems excessive (in the age of increasing online shopping it seems hard to justify this). More campus accommodation for students and central homes for the elderly (which may free up larger family properties) would seem not to be addressed and is very much needed.

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

**Attached documents:**

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**Comment ID:** PSLPP16/14226  **Respondent:** 8997345 / Eileen (Lee) Cartwright  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am concerned about both of the above given the proposed increase in traffic that the excessive additional housebuilding would create,

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

Attached documents:

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Whilst I accept the SANG in principle I agree with the view of the Tyting Society that a continued tenancy by Surrey Wildlife Trust to retain the farmland in agricultural use for the indefinite future.

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

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Traffic implications for the Tyting area

The lanes of the Surrey Hills are only suited to carrying a low level of traffic, often being narrow single track roads, as is the case for Halfpenny Lane and White Lane/Guildford Lane in the Tyting area.

The combination of the scale of growth proposed in this 2017 plan and a reduction of capacity in the town centre (as indicated by the plans for the Sustainable Movement Corridor and the Town Centre Regeneration Strategy) threatens to lead to much more peak hour traffic on minor roads around the town as drivers find alternatives routes.

This potential impact on the lanes should be avoided and the character of the lanes protected.

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

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

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

I object to the average annual target of 654 houses planned to be built over the period until 2034. The evidence in the Guildford Addendum Report (March 2017) is not soundly based. This high number is modelled from the demographic needs within the Borough representing some 85% of the overall projected increase.

The new evidence from GRA’s independent expert shows there is an over estimate of population growth of about 40%. The GBC proposal will result in needless loss of Green Belt and increased congestion.

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

Attached documents:

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

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

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

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

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

I, the undersigned am in complete objection to the land at Blackwell Farm being built upon as part of the Guildford Plan.

I have a young family, and we regularly go to walk and play in the land and woods adjacent to the Research Park and through Blackwell Farm: we walk up to the Hogs Back and enjoy the view: we forage throughout the year to provide food for our family: we enjoy the skylarks singing and the views where all but the cathedral tower is blocked by the mature woodland.

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

**True boundaries of Area Outstanding Natural Beauty**

To build on Blackwell Farm and the Hogs Back would blight the views of the wonderful Surrey landscape for miles and miles. The beautiful ridge can be seen from the ranges on the next ridge and beyond, and to have buildings on it would be to the detriment of our county. I ask that the recent study by Land Management Services be honoured which showed that Blackwell Farm and the Hogs Back meet all of the criteria for being an area of outstanding beauty (AONB) and should therefore be recategorised accordingly.

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

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

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

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

**Building on Greenbelt**

Originally defined to stop Urban sprawl, I feel that it is illegal and immoral to keep changing the boundaries of the Greenbelt, and this area should remain Greenbelt so that there is a clear rural area between developments.

**Risk of flooding to local area**
The Hogs Back, one of the highest points in the area, naturally drains onto Blackwell Farm, this then drains in to Park Barn. Currently the farm land becomes waterlogged each winter, and slowly releases the water into the ditches and culverts to the back of the properties on Applegarth Avenue. These are currently just able to cope with the rain, however, as soon as the land is covered with tarmac and houses, it is a huge concern that the properties will be regularly flooded. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

This is a huge concern to us as if our house were ever flooded it would affect our insurance premiums and make our house price fall considerably. We know from the experience of a family member that flooding protection often fails, and we do not trust the developers to make sufficient provision in this matter.

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

A brief walk through the Research Park, or University Campus will soon show you that the University does not build things to high environmental standards. They have a sprawling campus, covered with ground level car parks: street lighting that is left on permanently adding light pollution to the local area: they have felled dozens of mature oaks in the building of the car parks and buildings: they have air conditioning units for large office buildings that are left on all night adding noise pollution to the local area.

To allow a further 10 – 11ha extension to the Research Park when they have made such poor use of the land they have already built upon would be a poor decision by planners.

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

**Proposed railway station**

This will be to the detriment of the local residents in Park Barn despite what the Local plan says. Firstly due to the added noise and light pollution for the residents that back on to the railway line. Secondly, people will start to use the local estate as a car park for the railway stations. Obviously the council will then place parking restrictions on the roads, but then there will not be enough parking for the local residents and their visitors. We already have students for the University and hospital staff parking on the estate, it cannot take much more of this.

It is also proposed that it will serve existing housing developments. This is unnecessary as there are two extremely good bus routes for the local people in to Guildford town centre and the railway station. This will be purely for the Research Park, and if they were prepared to use public transport already, there is sufficient.

**Traffic**

To build the road that will provide access to the proposed development on an already busy junction of the A3 and A31 is ludicrous. There have already been fatalities on this stretch of the road which is getting busier each year, but to add another 3 – 4000 cars to that area of road can only cause more problems. We know that SCC are making plans for that stretch of road, but they are not listening to local people and councillors who have been asking for speed cameras on that stretch, so we do not trust their judgement.
The junction for the new road will also be on the ridge of the Hogs Back, therefore visible for miles around and a blight throughout the AONB, even with the landscaping proposed by the developers there will be noise and light pollution. As cars accelerate and decelerate, the noise pollution is worse, so this will be to the detriment of the local area.

To provide access from Gill Avenue will only add to the traffic on the west of Guildford around Park Barn, the Hospital and Research Park. This area cannot cope with any more traffic, especially as any light sequences are always swayed in favour of the Research Park, and not the local people.

Services

There are already not enough school places on the proposed development side of Guildford, short-sighted planning by previous councils has led to this. Our hospital and GP practices are also unable to cope with Guildford's requirements. Although provision has been made for a two form primary school, there is nothing for a secondary school, so all children once that age would have to go along the A31 and A3 to get to school, or go through the heavily congested Research Park. This is ill-advised and not at all safe.

Pollution

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

Wildlife Habitat

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

Ancient Roman Road and Settlement

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

Unable to afford rural house prices

We chose our house because although it is in a town, it is right next to an area of natural beauty, and fields that you can walk through in all seasons. We are unable to afford a house in a village and this was the next best thing for us as a family. No doubt, so as to make the most money from this development, the plan would be to put the less profitable houses nearer the railway line, and those which the premium could be charged for will be in the higher locations.

Green spaces
We do not believe that the University will provide enough green spaces - certainly how could they provide such long vistas as are already in the AONB and AGLV. Anything that they do provide will be a mere shadow of what once was, and this cannot be allowed to be. We know that there is already a meadow near to the Sports Park, but this is not advertised. We stumbled upon it once by chance and although nice in part, is artificial and tiny compared to the site planned for development.

True green spaces, and not manufactured ones are vitally important for the emotional and physical health of people. Anything that was created would no doubt mean a car journey for us to get to, and nothing in comparison to the beauty that Blackwell Farm and the Hogs Back currently proffer.

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

Attached documents:

Comment ID: pslp171/2249  Respondent: 8999361 / William May  Agent:

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

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

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

Please catalogue my objection to developing this area of green belt, outstanding national beauty and area of great landscape value.

I feel that this would be a wholly inappropriate development within the green belt. Primarily because it would be visible from and adjoin protected AONB and area of great landscape value. As soon as that happens the AONB is blighted. The character of the area, totally rural and picturesque, would be significantly harmed.

The local infrastructure could also not cope with it, despite the Highways Agency's plans to improve the A3 and A31 junction. There is so much traffic along that stretch of the A31 and A3 that when just one thing is altered tremendous tailbacks are created. For example this week the Surrey Sports Park diverted traffic slightly, and the queue to get to the hospital, research park, A3 and Park Barn was queued back nearly into town. It also took half an hour to leave Park Barn. This side of Guildford is already unable to cope with the volume of cars on the roads and could not cope with any more.

I also object on the grounds how it will negatively affect the flora, fauna and habitat within the local woodland, common land and farmland. For example there are nesting Skylarks each year in the land proposed to be developed, as well as many other species of animals and flora.

There has also not been a significant study in to how this will affect the areas of Park Barn where there has already been some localised flooding over the years. Currently the fields act as a run off for the Hogs Back, and where these to be developed there is concern about the risk of flooding among residents.

The harm to the local area far outweighs any special circumstances that the local council may deem fit and I urge the planners to reject plans at this site, despite the five year plan for house building.

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

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

We are all "Objection" to the Policy A26 (Blackwell Farm) under the Guildford Borough Council's Proposed Submission Local Plan (2017).

Under the inclusion of Blackwell Farm as a development site (Policy A26 & paragraph 4.1.9).

1.) It destroy the Outstanding Natural Beauty and the Natural Landscape of historic parkland.

2.) Impact on the local traffic network and increasing congestion in the area of A31 and surrounding road traffic network and hospital and all around local area.

3.) Impact on the local traffic network and increasing congestion in the area of A31 and surrounding road traffic network and hospital and all around local area.

4.) Impact on public health and safety as air pollution in the neighbouring area which has already shown exceeds safe EU limits for Nitrous Oxide.

With all the negative impact on the daily life and health of each individual in the neighbouring area. WE ARE ALL OBSESSION TO THE POLICY A26 (BLACKWELL FARM) UNDER THE PROPOSAL.

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

Attached documents:
Ash Manor, Ash

Very much local to Normandy, the capacity of the school is 1,050 and it has 940 pupils, so is **undersubscribed by 110 places**.

There is potential for the school being expanded to take more pupils by 30 places a year (so a total of an extra 150).

Connaught School

This is near Ash, but just over the County Boundary in Hampshire - but is also **undersubscribed by 90 places** and available to Surrey children.

Hoe Valley Free School, Woking.

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is **undersubscribed in its first year by 25**. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

The birth rate in Guildford has fallen over the past two years. This trend may or may not continue, it is another factor to consider.

The Green Belt in Normandy and the surrounding area is serving its purpose well.

To the West, Camberley, Farnborough, Aldershot, Ash, Tongham and Farnham are effectively one area or urbanisation, only the road signs tell you have moved from one town to the next.

Currently it is the green belt round Normandy & Pirbright that is stopping this conurbation merging with Guildford & Woking in the east.

The local roads are not currently coping with the current levels of traffic, on normal days there are long queues on the A323 & the A31. Days when there are problems on the A3 (not unusual) the whole area is stationary, which can last hours.

Both Glaziers lane & Westwood lane that border the proposed development are narrow country lanes and have little street lighting. Westwood lane has a single carriage limited height railway bridge. The bridge over the railway at Wanborough station is at an angle, effectively producing a chicane, the bridge has also subsided greatly and has been underpinned twice in the years I have lived here. The narrow pavements are only on one side of the roads and swap sides.

The pedestrian bridge at the station is not suitable for disabled access to the East bound platform. The development proposal will give access to the East bound platform. However a passenger arriving on the east bound platform will have to travel almost 1 mile to access the west bound platform for the journey home.

The proposal that both the 1100 residents and the 1500 pupils will mainly use the railway is clearly fantasy, just stand outside any school in the area and count the cars that deliver children.

The stream that cuts both Westwood lane and Glaziers lane floods the road from time to time.

The Wanborough station access quite frequently floods.

The development in Normandy is so close to Ash & Pirbright Heath lands (THB-SPA) sites of SSSI’s and Surrey Hills AONB that its negative impact needs to be considered.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The need for a secondary school appears to have been the idea of the proposed developer rather than a need identified by an educational body.

The availability of school places I understand is as follows:

Kings College, Guildford. The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies.

If Kings becomes fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils.

Christ's College is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

Ash Manor, Ash

Very much local to Normandy, the capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places.

There is potential for the school being expanded to take more pupils by 30 places a year (so a total of an extra 150).

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This is near Ash, but just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

Hoe Valley Free School, Woking.

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.
The birth rate in Guildford has fallen over the past two years. This trend may or may not continue, it is another factor to consider.

The local roads are not currently coping with the current levels of traffic, on normal days there are long queues on the A323 & the A31. Days when there are problems on the A3 (not unusual) the whole area is stationary.

Both Glaziers lane & Westwood lane that border the proposed development are narrow country lanes, have little street lighting. Westwood lane has a single carriage limited height railway bridge. The bridge over the railway at Wanborough station is at an angle, effectively producing a chicane. The narrow pavements are only on one side of the roads and swap sides.

The pedestrian bridge at the station is not suitable for disabled access to the East bound platform. The development proposal will give access to the East bound platform. However a passenger arriving on the east bound platform will have to travel almost 1 mile to access the west bound platform for the journey home.

The proposal that both the 1100 residents and the 1500 pupils will mainly use the railway is clearly fantasy.

The stream that cuts both Wetwood lane and Glaziers lane floods the road from time to time.

The Wanborough station access quite frequently floods.

The development in Normandy is so close to Ash & Pirbright Heath lands (THB-SPA) sites of SSSI’s and Surrey Hills AONB that its negative impact needs to be considered.

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

Attached documents:

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<th>Comment ID: PSLPP16/98</th>
<th>Respondent: 9002593 / Brett and Susan Whitby-Smith Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Sustainability versus Sensitivity, the local plan picks and chooses whether to separate Flexford and Normandy or separate Flexford and Normandy to try and justify the plan. Clearly this is not appropriate

The Development in Normandy is on the Green Belt, if I understand correctly, the exceptional circumstance that allows the destruction of the Green Belt is the proposal to build a New Secondary School which is not needed.

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

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The Development in Normandy is on the Green Belt, if I understand correctly, the exceptional circumstance that allows the destruction of the Green Belt is the proposal to build a New Secondary School to meet a supposed unmet need.

The Green Belt in Normandy and the surrounding area is serving its purpose well.

To the West, Camberley, Farnborough, Aldershot, Ash, Tongham and Farnham are effectively one area or urbanisation, only the road signs tell you have moved from one town to the next.

Currently it is the green belt round Normandy & Pirbright that is stopping this conurbation merging with Guildford & Woking in the east.

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

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The Development in Normandy is on the Green Belt, if I understand correctly, the exceptional circumstance that allows the destruction of the Green Belt is the proposal to build a New Secondary School which is not needed.

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

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As a long term resident of Normandy my comments are going to be about the local plan as it affects this area.

Under the proposed development in the local plan Normandy & Flexford effectively cease to exist as what is proposed is basically a new town swamping the existing villages.

This is clearly a disproportionate level of development.

Sustainability versus Sensitivity, the local plan picks and chooses whether to separate Flexford and Normandy or separate Flexford and Normandy to try and justify the plan. Clearly this is not appropriate

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

Attached documents:

Comment ID: PSLPP16/96  Respondent: 9002593 / Brett and Susan Whitby-Smith  Agent:

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

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

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

As resident of Normandy of more than 30 years my comments are going to be about the local plan as it affects this area.

Under the proposed development in the local plan Normandy & Flexford, 2 beautiful rural villages, effectively cease to exist as what is proposed is basically a new town swamping the existing villages.

This is clearly a disproportionate level of development.

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

Attached documents:

Comment ID: pslp172/641  Respondent: 9003009 / Nicola Brown  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/2527  Respondent: 9003361 / Caroline Burnett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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

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

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPA16/3781  Respondent: 9007457 / Belinda Baker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The number of houses proposed is too high and need to be checked

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

Attached documents:

Comment ID: PSLPP16/15972  Respondent: 9007457 / Belinda Baker  Agent:

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

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

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

The roads are grid locked already and the here is no infrastructure in place.

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

Attached documents:

Comment ID: PSLPP16/15971  Respondent: 9007457 / Belinda Baker  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Houses should not be on the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15973  Respondent: 9007457 / Belinda Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There have been no consultations with the local people affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: psp172/1733  Respondent: 9007457 / Belinda Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2338  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposed Blackwell Farm development on purely practical grounds. It is hard to see how another 3 or 4 thousand cars could possibly be fed into the already highly congested area where the A31 and A3 meet. Even with the proposed traffic light at the top of the proposed new road up through the A.O.N.B. om Down place, How many cars are you going to be able to feed in to the stationary queue of traffic on the A31 at peak times, with each change of the lights? Four or five? How long will it take to feed in a thousand or more? Meanwhile, they will be queueing up on the steep slope, which is going to seriously exacerbate the air pollution, which I believe is already as bad in parts of Guildford, as in central London. Then there is the question of how ambulances are going to get through all this extra congestion, to reach the hospital. The other proposed access road through Gill Ave, is already seriously congested at peak times, without adding
another 1,000 odd cars to the situation, even if government funding is forthcoming to widen the A3. The argument that most of the people in the new estate will work locally is pure wishful thinking, as houses will be sold to the highest bidder i.e. the London market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2342  **Respondent:** 9009025 / Peter Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I also object to the proposed 1,000 houses proposed to be built at Normandy, as the Aldershot road is already severely congested at peak times.

Finally, I object to the local plan, because GBC has failed to identify any exceptional circumstances to justify mass development on the Green Belt, general housing need having been specifically ruled out in the N.P.P.F. as an exceptional circumstance. Successive governments have sat back and let more and more people drift to the south east, with the result that Surrey is now the most densely populated county in the U.K. Surely any large scale development should go to areas where jobs are more needed, and any houses built will be more affordable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5119  **Respondent:** 9009025 / Peter Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I would also like to object to the secretive and high-handed way in which the SHMA process has been The annual house building target is more than double what was agreed in 2010, and more than double what could be explained by the population growth figures for Guildford for the last twenty years. Also, unlike last time, no constraints have been applied for infrastructure or environmental factors, with no explanation offered as to why. GBC has repeatedly refused to involve their electorate in discussing this matter, and has steadfastly refused to explain what factors could account for this huge hike in the annual house building target. All we do know is that G.L. Hearn, who did the SHMA, has a vested interest in setting the figure as high as possible, to generate work for their associates at Constructionline. Government guidelines state that the community should be able to feel confident that the SHMA figure is fair and objective. For the reasons given, GBC has failed woefully in this regard.
Furthermore, I object to the fact that the infrastructure has not been properly assessed, and is inadequate to deal with current housing levels. Anyone who knows Guildford will tell you that traffic congestion here is dire, with long stationary queues of traffic on the A31 and A3 a daily occurrence, and the smallest incident can result in total gridlock. How the planning department can propose adding another possible 26,000 cars to the situation beggars belief, even taking account of the modest improvements to the infrastructure proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5059  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have written to the local government ombudsman to complain about how the new Guildford local plan is such a complete betrayal of your party's headline election pledge 'The Green Belt Stays'

He has written back, saying that I am required to write to you first. The grossly misleading nature of your party's election pledge had the effect of deceiving Conservative voters into thinking that they were voting for a party that was going to protect the Green Belt, not build thousands of houses all over it, and consequently they were cheated out of having a vote on the most important local issue for many years, whether or not they wanted mass development on the Green Belt.

This means that there is no legitimate democratic mandate for the local plan.

There is, however, a simple and cost-free answer to all this, which could possibly provide you with a legitimate mandate for your plan, and win back some respect for your party.

You could first of all issue a prominent apology to your voters for having so misled them, and when the referendum for the elected mayor comes up, question one on the ballot paper could read 'Do you want an elected mayor?' and question two 'Do you want large scale development on the Green Belt?'

This may be unorthodox, but a serious deception has been perpetrated on the Conservative voters of Guildford, and this would put it right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5118  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object strongly to the new local plan for several reasons.

Firstly, and most importantly, there is no democratic mandate for mass development on the Green Belt. The Conservative party fought and won the local election with the headline pledge 'The Green Belt Stays'. Conservative voters were thereby deceived into thinking that they were voting for a party that was going to protect the Green Belt, not build thousands of houses all over it, and were consequently cheated out of having a vote on the most important local issue in a generation, whether or not they wanted mass development on the Green Belt. I have reported this electoral fraud to the Nolan Committee on standards in public life.

Despite this, some 20,000 people, who remembered that the Conservatives had reneged on promises to protect the Green Belt before, voted against the first version of the local plan, [which is largely the same as the present plan], and voted for the Guildford Green Belt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5120  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to the brownfield sites identified by the G.G.G. and others, there are huge areas of ground level parking in the town, land that could be used far more efficiently. The university should also be made to honour the promise it made, when given the 60 hectares of land at Manor Park. and build the accommodation for the 3,000 students still outstanding. In fact, it has been calculated that there is sufficient and on that sprawling site, to accommodate all the 7,000 students currently living in rented houses in the town, thus freeing up some 2,000 houses for Guildford families. This would have the added benefit that the houses would pay council tax, which, as houses in multiple occupation, they currently do not.

I also object to the way GBC is attempting to deal with the shortage of affordable housing in Guildford. In his talk here last year, the eminent planning expert, Alan Wenban-Smith, said that to expect commercial developers to build anything like 40% affordable housing, on prime Green Belt land, that they have paid premium prices for, was completely unrealistic. 'It just isn't going to happen' he said.

He also pointed out that it is actually hugely more expensive to build on greenfield sites, than on brownfield sites, because it is so very costly to have to put in all the infrastructure and services, whereas with brownfield sites, some, or an of them, will already be there. So if it is affordable housing you are seeking to provide, surely you have to go for the least expensive sites, not the most expensive ones. You are left wondering whether GBC is either very naive about how commercial developers operate, or whether they are not really serious about providing affordable homes.
As a resident of Wood St. Village, I particularly object to the proposed huge development at Blackwell Farm, on the northern slopes of that beautiful and iconic feature of Surrey's landscape, the Hog's Back.

I object for many reasons. Firstly, because the N.P.P.F states that the Green Belt should be considered permanent, the most modest definition of permanence being defined as at least 20 years, [which many people may consider not very permanent at all]. But even by that weakest definition of permanence, the university is surely not entitled to apply to push back the Green belt till 2024, as it was pushed back for them in 2004 when they were given the 60 hectares of prime Green Belt land at Manor Park The N.P.P.F. also states that planners should choose land 'oflow environmental value' and 'refuse permission when it would have a detrimental effect on ancient woodland' . The whole site is either A.O.N .B. or A.G.L.V., it is bordered by ancient woodland to the east and to the west, and to the north by common land designated as an S.N.C.I. I cannot see how ,by any stretch of the imagination, that could be described as being 'oflow environmental value'. Walking across the proposed site affords the most extensive panoramic views of the north side of the Hog's Back A.O.N.B., in it's A.G.L.V. setting, to be found anywhere between Guildford and the Farnham conurbation. There is no view like that in the whole of East Anglia.

The whole area is a green lung , mitigating the air pollution in Guildford, due to the prevailing westerly winds. It is also highly productive farmland, and it has been estimated it produces something of the order of 1.5 million loaves of bread each year. Planners are also required by law to do what they can to maintain biodiversity , are they not? I object strongly that this whole local plan, by concentrating development on greenfield sites, totally fails in it's duty,in this regard. Local wildlife experts have observed over 50 species of wild birds on Blackwell Farm, including four species whose decline has been so drastic in recent years that their special protection is specifically mentioned in the N.P.P.F. These are the skylark, the yellowhammer, the linnet, and the lapwing. I have personally seen all these species on the site in recent years. Our green spaces are a precious and finite resource ,shown by recent studies to be of great psychological benefit to the nation, and should only be destroyed as a last resort, not as, in this case, a first resort, when the university has ample planning permission to build on brownfield sites at Manor Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly want to strongly object to the inclusion of Blackwell Farm as a development site[Policy A26 & para.4.1.9.], as this disregards an independent expert landscape study, which shows that part of the site merits A.O.N.B. status, following Natural England's forthcoming boundary review[para4.3.8.] Even without that, the new road running right across the existing AONB  will reduce it to a narrow strip of land , with a dual carriageway on one side, and 1800 houses on the other. Will it still meet the criteria to be called an AONB? I doubt it.

It also proposes more office space to an extended business park [policyE4] which will increase peak time congestion, particularly around the hospital and A&E, and will encourage rat-running through residential areas.

This proposal also ignores independent traffic studies, which show the impact of the Blackwell Farm development on the local network, and question the viability of the scheme[2.14a].
This proposed development will add to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrous oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1452  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The second important development since the last consultation is the publication of the INRIX report, which revealed that Guildford has the worst traffic congestion of any town in the whole of the U.K., and worse than many major cities like Glasgow, Cardiff, Belfast, Liverpool, and Bristol, making it the sixth worst congestion hotspot in the entire U.K. This independent report completely vindicates what many people have been saying for years, that Guildford is not a suitable site for mass development on the sort of scale proposed in the local plan. Nor will the modifications to the slip roads on the A3 significantly improve the situation, as the main problems are the sheer weight of traffic, which will only get heavier, due to the large developments at Aldershot, Farnborough, Cranleigh, Dunsfold, and Blackwell Farm, making the congestion at the junction of the A3 and A31 even worse, and the fact that the A3 narrows to four lanes through Guildford. So I object to the changes to the local plan because of the intolerable traffic congestion they will cause, as now confirmed by the INRIX report.

The INRIX report also deals with the question of the supposed government pressure on local authorities to just keep building more and more houses. Surely no government minister, with any common sense, on being shown it's findings, is going to think Guildford is a suitable site for mass development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/276  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
First of all I would like to object to the council's use of 'Section 19'. The scale of the opposition to the last plan, from the people whose views they were elected to represent, makes it pretty clear that the plan needed a radical rethink, and not just the modest adjustments permitted under section 19. The use of section 19 also has the effect of stifling debate, and indeed many people are not at all clear what they are allowed to say at this point. Inevitably there will be considerably less comments than last time, and I hope the council will not try and misrepresent this as a sign that voters are any more happy with the plan.

I would like to object strongly to the changes to the draft local plan. It was good to hear that the inspector will see our responses to the last plan, as this one remains substantially the same, despite the public outcry. This leads many people to think that the so-called 'consultation' was pretty much a sham, and that the council has largely gone ahead and done what it wanted to do in the first place.

Since the last consultation, there have been a couple of important developments, which were not in the public domain then, and hence we were unable to comment on them.

The first is that the housing minister has recently, on BBC radio 4's 'Today' program, defined the 'exceptional circumstances' that would justify building on the Green Belt, none of which apply to Guildford. They are:

1. That all existing planning permissions have been built out. This does not apply to Guildford, as the university was given planning permission, in 2003, to build 4,790 student and staff units on Manor Park, and, according to the UoS website in April this year, it had only completed 1,637 units
2. That there is no possibility of more intense development within existing town boundaries. This does not apply to Guildford, as there are some 17 hectares of ground level parking, land which could be used far more efficiently.
3. That there are no brown field sites available. This does not apply to Guildford either, as there are brown field sites at Styfield, Walnut tree Close, Woodbridge Meadows, Shalford, and elsewhere.

These exceptional circumstances apply to any Green Belt land. Presumably the circumstances that would justify building on AGLV, and AONB, as at Blackwell farm, would have to be considerably more exceptional.

So I object to changes to the local plan on the grounds that it is in contravention of clearly expressed government policy on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of immediate provision for new schools
2. I object to the lack of any immediate provision for Medical Facilities and Surgeries
3. I object to the allocation of land to the strategic sites of Wisley Airfield and Gosden Hill Farm as development of these sites would have a disproportionate impact on the surrounding villages
4. I object to site A43 athe on and off ramp at Clandon as it will increase traffic problems in the villages
5. I object to the A3 road from the M25 to Guildford becoming so congested that it will become a serious health hazard as a result of exhaust fumes from stationary or very slow moving vehicles

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1365  Respondent: 9009153 / Lindsay Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to all erosion of the Green Belt
2. I object to any removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1366  Respondent: 9009153 / Lindsay Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the disproportionate amount of development in one area of the borough
2. I object to the limited consultation period
3. I object to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1027  **Respondent:** 9009153 / Lindsay Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**I object to removal of Brownfield site (A34) from the Plan**

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1026  **Respondent:** 9009153 / Lindsay Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**I object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail, thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a devastating impact on the already highly congested local rural road network around Send and Ripley. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
I object to the allocation of 6 Travelling Show-people sites in A34 Garlick’s Arch

The allocation of 6 Travelling Show-people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show-people plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveler sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. *The site [A43] location affords greater separation between Send Marsh / Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) than the Burnt Common site did”*

2. *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore, GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:  *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a disgraceful sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/120  Respondent: 9009153 / Lindsay Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/1832  Respondent: 9009185 / Diana Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the SHMA which was clearly put together by a firm that had a vested interest in setting the figure as high as possible, due to their connection with Construction Line.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to building on the Blackwell Farm site, where numerous NPPF instructions would be contravened, and also National and International commitments on protecting Biodiversity. It would make a mockery of these ‘instructions’. Surrey University should be forced to honour their commitment to building on the Green Belt land they were given, in good faith, in 2004. As the Green Belt was pushed back for the University in 2004, they are not entitled to apply to push it back further until at least 2024..

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/7971</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of preparation for the infrastructure, which will have to cope with the huge increase in traffic, which will obviously cause massive congestion and air pollution in an already highly congested area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to the lack of democratic mandate, due to the fact that the Conservative councillors misled the voters by a headline pledge to protect the Green Belt, therefore taking votes away from the new Guildford Green Belt party. Once voted in they immediately reneged on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It also proposes more office space to an extended business park [policyE4] which Will increase peak time congestion, particularly around the hospital and A&E, and will encourage rat-running through residential areas. This proposal also ignores independent traffic studies, which show the impact of the Blackwell Farm development on the local network, and question the viability of the scheme[2.14a]. This proposed development will add to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrous oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The second important development since the last consultation is the publication of the INRIX report, which revealed that Guildford has the worst traffic congestion of any town in the whole of the U.K., and worse than many major cities like Glasgow, Cardiff, Belfast, Liverpool, and Bristol, making it the sixth worst congestion hotspot in the entire U.K. This independent report completely vindicates what many people have been saying for years, that Guildford is not a suitable site for mass development on the sort of scale proposed in the local plan. Nor will the modifications to the slip roads on the A3 significantly improve the situation, as the main problems are the sheer weight of traffic, which will only get heavier, due to the large developments at Aldershot, Farnborough, Cranleigh, Dunsfold, and Blackwell Farm, making the congestion at the junction of the A3 and A31 even worse, and the fact that the A3 narrows to four lanes through Guildford. So I object to the changes to the local plan because of the intolerable traffic congestion they will cause, as now confirmed by the INRIX report.

The INRIX report also deals with the question of the supposed government pressure on local authorities to just keep building more and more houses. Surely no government minister, with any common sense, on being shown it's findings, is going to think Guildford is a suitable site for mass development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/269  Respondent: 9009185 / Diana Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First of all I would like to object to the council's use of Section 19. The scale of the opposition to the last plan, from the people whose views they were elected to represent, makes it pretty clear that the plan needed a radical rethink, and not just the modest adjustments permitted under section 19. The use of section 19 also has the effect of stifling debate, and indeed many people are not at all clear what they are allowed to say at this point. Inevitably there will be considerably less comments than last time, and I hope the council will not try and misrepresent this as a sign that voters are any more happy with the plan.

I would like to object strongly to the changes to the draft local plan. It was good to hear that the inspector will see our responses to the last plan, as this one remains substantially the same, despite the public outcry. This leads many people to think that the so-called 'consultation' was pretty much a sham, and that the council has largely gone ahead and done what it wanted to do in the first place. Since the last consultation, there have been a couple of important developments, which were not in the public domain then, and hence we were unable to comment on them. The first is that the housing minister has recently, on BBC radio 4's 'Today' program, defined the 'exceptional circumstances' that would justify building on the Green Belt, none of which apply to Guildford. They are:

1. That all existing planning permissions have been built out. This does not apply to Guildford, as the university was given planning permission, in 2003, to build 4,790 student and staff units on Manor Park, and, according to the UoS website in April this year, it had only completed 1,637 units
2. That there is no possibility of more intense development within existing town boundaries. This does not apply to Guildford, as there are some 17 hectares of ground level parking, land which could be used far more efficiently.
3. That there are no brown field sites available. This does not apply to Guildford either, as there are brown field sites at Slyfield, Walnut tree Close, Woodbridge Meadows, Shalford, and elsewhere. These exceptional circumstances apply to any Green Belt land. Presumably the circumstances that would justify building on AGLV, and AONB, as at Blackwell farm,
would have to be considerately more exceptional. So I object to changes to the local plan on the grounds that it is in contravention of clearly expressed government policy on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/43  Respondent: 9010049 / DW Garrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4013  Respondent: 9010113 / Doris Shepherd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to your draft local plan, particularly how it effects Burpham.

No consideration at all has been given to the village ambience of Burpham or to its residents.

For some time now we have seen new houses appearing wherever space has become available and we have had to absorb this, but your Gosden Hill proposal would be catastrophic.
The A3100 through Burpham is already overworked: Most of it is single lane each way and there is little scope to widen it. Your enormous Gosden Hill Farm proposal is likely to increase the number of cars using the A3100 to such an extent that residents living alongside or in the side roads will find themselves trapped.

The A3 has caused dissatisfaction ever since I came to Guildford 21 years ago and it needs priority consideration.

I am not a surveyor, nor do I have the technical knowledge to make worthwhile feasible suggestions, but the Burpham Community Association has done extensive research into the problems and has some professional expertise. I must ask you to consider their response very carefully.

Why do we need such a ridiculous number of houses and who says that we need them? Can the utilities ie sewers, water supplies, gas and electricity meet the demands?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3170  Respondent: 9014017 / C Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4913  Respondent: 9016641 / J.L. Hearn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/209  Respondent: 9016897 / D Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1943  Respondent: 9016897 / D Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/1945</th>
<th>Respondent: 9016897 / D Grover</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstaniated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies ID1 & ID2 Infrastructure – My Objections**

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …"we forecast that there will also be an absolute increase in overall traffic volumes" and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has **less** substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

**Summary of the Impacts on the A247 – My Objections**

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp17q/58  **Respondent:** 9016897 / D Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Non-plan Items– My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5783  Respondent: 9019105 / T Blunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/425  Respondent: 9019937 / Jackie O'Loughlin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my objection to any further development of Blackwell Farm and surrounding area (Manor Farm etc). Living in Onslow Village we already get trapped when the A3 and A31 (Farnham Rd) get gridlocked due to minor incidents from the M25 down to Hindhead.

The road infrastructure is not in place to be able to cope with the extra traffic, people etc that this development will bring.

The A3 through Guildford already struggles to cope with the amount of traffic now and as soon as a car breaks down the whole town and Onslow Village become completely blocked. People use Onslow Village as a cut through and race through the streets already this will only get worse as they try to dodge the queues.

This development will also cause a beautiful green area to be totally ruined, this will affect the wildlife, the flowers and fauna as well as cause increased pollution and traffic noise.

The schools cannot cope Guildford County School is already having to build an extension in order to add 20 more pupils.

The university is gradually getting bigger and bigger with more and more student accommodation appearing.

This would just be one development too much.

Stop this nonsense now - refuse this planning proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp172/5139  Respondent: 9024577 / Ian Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3964  Respondent: 9024705 / J.W. Failes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
• add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10762  Respondent: 9025025 / Kate Millington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to GBC’s proposal to remove Green Belt protection from a number of villages in the Guildford area including my village Chilworth. I find it astounding that it is even being considered. Focus should be on existing brown land areas around the Guildford area that are in need of improvement and are better placed to offer affordable housing and accessibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1220  Respondent: 9025217 / Lynne Hanes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I very strongly object to our beautiful villages being removed from the protection of the Green Belt.

Any development within them will cause major disruption to our heavily congested roads, already restricted by parking on pavements, verges, as well as narrowing the high way.

Our schools, hospitals and infrastructure cannot support this.
We need to fight for any green space and countryside for relaxation and health to combat our working lives for the health of our children.

There must be other suitable sites for development where the traffic is not an issue. Guildford and its villages have a large number of schools and stations creating huge rush hour problems, especially for those trying to access Royal Surrey Hospital and other major routes.
Hope all the above are taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4129  Respondent: 9025249 / Y Hofner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Chilworth from the Green Belt.
I find it difficult to understand why the village of Chilworth is to be removed from the Green Belt when other villages in the Tillingbourne valley, i.e. Albury, Shere, Gomshall and Abinger, are not to be removed.

In the St. Martha Parish of Chilworth, most of the land is in an area of outstanding natural beauty. Is it also intended to take this out of the Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3226  Respondent: 9025569 / Phillip Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a West Horsley resident and have taken a keen interest on the borough’s new local plan. Sadly, insofar as our West Horsley plan is concerned, I would like to register my objections on several fronts:

• I don’t believe the case has been made for such an intrusion into green belt land nor for an extension of the boundaries which just sets this village up for substantial further development in the future.
• The density of the housing proposed is too much and runs unnecessarily right up against the boundaries of many existing homes which were purchased precisely because they had ‘green’ outlooks – why not have more ‘buffer’ zones.
Specifically in the Manor Farm development near us, you appear to retaining Ben’s Wood as a public space yet significantly closing off its access to the new development and others like us who have been able to walk through it along a strip of land at the rear of Northcote Road homes.

Why is woodland being taken down (e.g. Manor Farm tree ‘nursery’) when brown field sites and some green field sites off existing roads are available.

I found little evidence that there are concrete plans to address the capacity of local schools, car parks, medical facilities and other public amenities that the residents of Horsley rely on. The local roads are already in a very poor state in many places as it is.

The scope of the proposed development at Wisley will impact the traffic (access to/from the A3) and local amenities enormously.

The rationale behind the number of new homes proposed for West Horsley seems very opaque and ill thought through – it will completely change a rural village into a mini-town.

I do hope that you will listen to people’s concerns and revise the plan again. Many of us accept that new homes are needed but but at the expense of changing the face of established communities so utterly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In response to your letter of 2 June, we understand that it is proposed to remove the villages of Chilworth, Peasmarsh and Shalford from the Green Belt and we would certainly oppose his as all three villages on their boundary road signs state that they are in the Surrey Hills.

With regard to Chilworth the Borough has designated several conservation areas close to the historic gunpowder mill wood, a heritage site owned by the borough observes reckon that ten thousand visitors a year walk or cycle through this site, many not local, and the continuation of the Green Belt is vital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Slyfield Area Regeneration Project

Having recently experienced the foul odours emitted by some of the industrial plant at Slyfield Green (presumably the abattoir and waste disposal plant) I am concerned that GBC are considering building 1000 new homes as part of the Slyfield Area Regeneration Project. If GBC has legislative powers to ensure that industry does not cause air pollution, then I suggest that they use these powers to eradicate the unacceptable odours in the Slyfield area. I question whether it is ethical to build 1000 homes in a neighbourhood which, under current conditions, would be blighted by foul odours whenever the wind was in their direction. I also question to what extent it is healthy for babies and children to be raised in such an environment. Masking the foul stench with some synthetic, less disgusting odour is, in my opinion, not an acceptable alternative.

I note that in the Local Plan, under the Slyfield Area Regeneration Project, key considerations are stated as being: allotments, flood risk and design. However, reference to the effect of unacceptable air pollution on the quality of people's lives has been completely overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to voice my objection to the housing plans in the Normandy Area. 1,100 houses & an unneeded secondary school.

It is of great concern to everyone who lives in this area. It is also very obvious that there has been little to no research done as to the impact this will have on the local community & the infrastructure & services in our area. If there was such research then we would not be having to write to object to such plans. If you lived in this community then you would clearly understand that Normandy would not be able to cope with such a destructive concept.

It's a small community & a happy one. We do not wish to become an extension to Guildford. It's a village, not a borough. It currently has very struggling services & a larger community would not help. Just try getting an appointment at the local doctors surgery. You have to call up early in the morning to only find that there are no appointments available. How on earth would expanding the village help an already stretched service.

The disruption caused by the building of so many houses would be crippling to the roads & environment. These roads are simply not able to cope with the type & volume of construction vehicles required to carry out this sort of building work. The roads here are small residential lanes & have no room for expansion.

In Regards to the secondary school. This is simply not required in this area. It would also create more traffic coming into the community from people who do not live in this community. It would turn Normandy into a thoroughfare. Simply put, it would be a nightmare for people who live in this community.

Also, I can’t believe that anyone is thinking of building on the land in question. It is well known that this land is waterlogged. It floods regularly & is totally unsuitable for housing. Most people who live here are fully aware of this. If this is being ignored, then it is very irresponsible & potentially a health risk. I’m sure you must now be fully aware of this. Even this email is making you aware. Which also means that if construction was to go ahead and flooding was to happen..... and it would. You would now be legally liable & accountable.

Expansion of villages are inevitable. Everyone accepts this. But that normally means a few houses here and a few houses there. NOT total destruction of a fantastic village by people who are simply thinking about quotas & profit. By people who do not live here & do not care.

We will fight this & not stop fighting this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
- put additional strain on local doctors/schools/dentists etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2888   Respondent: 9029505 / Maxine Bushell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council's draft local plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will: destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty; remove 72 hectares of scenic farmland and additional ancient woodland from the green belt; increase tailbacks and traffic congestion on the A31 - which have already got worse in recent months; result in increased "rat-running" through local roads and villages; add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/623   Respondent: 9029633 / Jean Pereira   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4528  Respondent: 9030561 / Libby Mccarty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I just wanted to register my disapproval at the plans to build over 1100 houses & a secondary school in Normandy & Flexford.

I live on the outskirts of Normandy on the Guildford Road, and therefore see how extremely busy already the main road is each day especially in the rush hour, and have heard & seen many accidents, some of which have been fatalities or very serious accidents. On occasions the road has had to be closed and air ambulances have been called on several occasions, which further impedes traffic congestion in the surrounding area.

If every new household has at least 2 cars in the new development plus the added traffic with Parents dropping off and collecting children from the proposed secondary school I am extremely worried on how this will impact on an already heavily congested road, let alone the surrounding side roads which are used as short cuts.

The villages of Normandy & Flexford are not designed for heavy traffic so I believe these plans are completely ludicrous & therefore oppose these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/838  Respondent: 9030849 / Steven Archibald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/315  Respondent: 9036641 / Roger Atkinson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/824  Respondent: 9036769 / June Milton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1615  Respondent: 9036961 / Andrew Lowther  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1993  Respondent: 9037185 / E Moseling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/4959  Respondent:  9037665 / Mary Beeston  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/6367  Respondent:  9037793 / T.B. Carter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the proposed development A22 in Keens Lane. It is in the Green Belt. The road (Keens Lane) is far too narrow. As it is there are many near misses! Tangley Lane is also narrow which it joins at the roundabout. Worplesdon Road and the Aldershot Road are often at a standstill. The Infrastructure is totally unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4700  Respondent: 9039745 / Nicholas Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to proposals in the draft plan particularly those intended at Blackwell Farm. What are The University, I thought they were a place of higher education not a vast profit making machine whilst they need funding to progress but not at the expense of our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9952  Respondent: 9039745 / Nicholas Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Living in Compton I am very concerned at the impact it will have on not just our already heavily over used road which already suffers from very high pollution.

It seems we would be sucked into the urban sprawl of Guildford losing our rural positioning as a small village I believe it has been suggested the proposal for 2600 new homes at Dunsfold and associated services would not increase traffic volumes through Compton I think there is some very naive thinking on that issue. The road structure as it seems does not work at this time higher volumes will bring massive grid lock. I know people are reluctant to come to Guildford simply because of traffic problems more will not help the businesses of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/9954  Respondent: 9039745 / Nicholas Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please give more due consideration to the draft plan and use other means of producing more homes for the supposed housing shortage.

There is never any mention of the old CEGB site at the bottom of town it had a high rise building of offices surrounded by the same surely that would create many affordable dwellings on a high rise basis without owners needing cars particularly with the close proximity of railway and buses.

What is happening to address the main core problem of the Supposedly Housing Shortage that being OVER POPULATION or perhaps this is a matter for a higher authority

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1134  Respondent: 9039745 / Nicholas Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/194  Respondent: 9040673 / Anne Pearse  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, this plan is ill conceived in relation to A44

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/195  Respondent: 9040673 / Anne Pearse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, A44 proposal was added after regulation 18 and has not been consulted on

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/197  Respondent: 9040673 / Anne Pearse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, GBC have continually changed the plan and most recently by adding A44 without consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: SQLP16/198  Respondent: 9040673 / Anne Pearse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object, A44 proposal will have a major negative impact on the area and in particular Send Hill Road and Potters lane and the adjacent homes. The travellers site in particular will have a major negative impact on the area by introducing a significant number of vehicle move, nets, but of a high gross weight on roads that are not designed to take this type of traffic. The number of Lorraine's, vans, tippers and trades related ancillary equipment will be both an eyesore and a danger to pedestrians and the locals in general.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: SQLP16/199  Respondent: 9040673 / Anne Pearse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object, GBC have not cooperated on A44 by adding this in after the local plan was published and by not consulting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: SQLP16/200  Respondent: 9040673 / Anne Pearse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to A44.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/201  
Respondent: 9040673 / Anne Pearse  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object.

The proposal for A44 is ill conceived and not though through. The land in question is known to have a dangerous sub soil as a result of previous landfill, the increase in homes and the travelers site will increase the amount of traffic on roads that are not designed for high frequency occupation, in addition, the types of vehicles used by travellers generally includes higher gross weigh trades vehicles, vans, lordosis, tippers and general building / construction machinery which will be both an eye sore and a danger to the local residents. The housing development will also generate a high number of personal vehicles as in the current age, home usually have at least one vehicle, but as families grow, this could easily become 2,3 or more vehicles with will almost certainly end up being parked on the roads or pavements.

I can not object strongly enough to A44. This development must not be allowed to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/468  
Respondent: 9040801 / John Alderman  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7110  Respondent: 9042049 / Victoria Sandu  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of Garlick's Arch off the Portsmouth Road to include the building of 400 houses and 7000 m2 of industrial space. This site floods on occasion and is covered by ancient woodland, including trees dating from the 16th century.

The 'Housing Delivery' document in the draft local plan suggests that this site is required to facilitate the provision of a northbound on and a southbound off slip road onto the A3 from the A247, which will provide significant improvements to the highway network and is fully supported by Surrey County Council. This document then goes on to state that 'On this basis we consider that the benefits of developing this site outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries...' The addition of two slip roads providing access to and from the A3 does not constitute 'exceptional circumstances' and I object to Guildford Borough Council using this as a justification to modify the Green Belt in this area.

- I object to the area at Garlick's Arch having an additional 7000m2 of industrial space added as the latest Employment Lands Needs Assessment 2015 shows a reduction in required floorspace of 80% from the previous plan made in 2013. If any additional floorspace is required this should be located at Slyfield Industrial Estate which has had valid plans to expand since 2014.

- I object to the lack of due process that Guildford Borough Council have followed in reaching the decision to add the development of Garlick's Arch at the last minute, prior to including in the latest draft Local Plan. Since 2014 every proposed major development in Send and Send Marsh has been changed, with the original proposal for an additional 430 houses in 2014 being reduced to 185 by April 2016, and suddenly being increased to 485 in May 2016. Such large changes require full consultation under Regulation 19 of the planning process - this process has not been followed.

I urge Guildford Borough Council to reconsider the above changes currently being considered as part of the Local Plan, and look forward to reviewing a new plan that has been amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7109  Respondent: 9042049 / Victoria Sandu  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<tr>
<th>Comment ID: PSLPP16/15952</th>
<th><strong>Respondent:</strong> 9042049 / Victoria Sandu</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the creation of a new interchange between the A247 and the A3 at Burnt Common. Whilst this is seen as providing access to the A3 for the new development at Wisley, it will inevitably provide easier access from the developments at Wisley, and Gosden Hill to Woking, thereby significantly increasing traffic through Send in to Old Woking on the A247, a route that is already very congested and not able to cope during peak periods. Noise and pollution levels will exceed the already high levels.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/827</th>
<th><strong>Respondent:</strong> 9042273 / Janet Garbutt</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the insetting of the villages of Send, Send Marsh / Burnt Common and Ripley and their resulting removal from the Green Belt. The NPPF (paragraph 80) sets out five main purposes of the Green Belt, including:

- To check the unrestricted sprawl of large built-up areas,
- To prevent neighbouring towns merging into one another,
- To assist in safeguarding the countryside from encroachment

The three villages of Send, Send Marsh / Burnt Common and Ripley both together and including the green spaces in between ensures that there is a buffer against the towns of Guildford and Woking becoming one continuous conurbation. The insetting of these villages would make it far easier to make future developments in and around these villages, thereby making the future merging of Woking and Guildford conurbations more likely, and thereby going against the main reasons for having the Green Belt in the first place. There are no obvious special circumstances given in the Local Plan to justify removing this restriction.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1140  Respondent: 9042497 / M Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3825  Respondent: 9042753 / Julia Trinick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Blackwell farm development on Greenbelt; The university should build high rise on campus to accommodate students.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3824  Respondent: 9042753 / Julia Trinick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A53

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inset of a traveller site in Wood Street Village as this has been refused by 'Planning'.

Any insetting in retrospect is wrong and is purely devised to give permission to an illegal development on Greenbelt that has had previously been refused by the Council.

Any suggestion that this development maintains the openness of Greenbelt is mistaken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8117  Respondent: 9042753 / Julia Trinick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Wood Street Village being inset from the Greenbelt. We are very close to Guildford and need the protection that the Greenbelt gives us.

i.e. Wood Street Village gives open space to Greenbelt and acts as a buffer to urban sprawl to prevent Wood Street from being absorbed into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8116  Respondent: 9042753 / Julia Trinick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of houses proposed is unsustainable with the infrastructure.

I cannot see the need for so many houses. Why do we need 3x as many as we are building now? We haven't seen the backup but it does seem far too many!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1924  Respondent: 9042849 / Frank Hawker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/1928  Respondent: 9043073 / Martin Ham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1737  Respondent: 9043233 / A Morland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighboring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
3. Why build all these houses in such a short period (5 years) when there is insufficient infrastructure in place to support such development?

4. Why build so many more houses when there is no work available locally and the proposed new commercial developments are on the other side of the borough? There is a very infrequent bus service in the village (and none at weekend) and most families would need cars for work and to take children to school.

5. Where will the new children who would come to Jive in the village go to school? Raleigh School is already full to capacity and so is Howard of Effingham.

6. East Lane is often flooded in heavy rain and the development suggested on East Lane would add to this problem by roads, drives, patios etc. reducing the natural drainage.

7. There is insufficient parking in the Horsley to cope with existing requirements. What additional land would be taken for parking at the station and shops?

8. Medical facilities are already stretched and will be made even worse with such an increase in population. The total increase in population in the whole borough would significantly increase the demand on Royal Surrey Hospital and as far as I am aware there are no proposals for a major increase in capacity at the site.

9. In addition to the houses in West Horsley a further 140 are proposed for East Horsley, 400 at Ripley and over 2000 at Wisley Airport. These will all impact on West Horsley and alter the nature and character of the villages in this beautiful part of Surrey causing congestion and pollution.
10. On most of the sites proposed there are many mature trees which contribute greatly to the environment and beautiful aspect of this lovely old established village and many of these would inevitably be filled to the detriment of the GREEN BELT.

I would further like to point out that the Council's claim, in its own newspaper "ABOUT GUILDFORD" Summer 2016, that the plan seeks to give protection to the Green Belt making use of brown field sites first is A SHAM and this relates to WEST HORSLEY AND THE WHOLESALE DESTRUCTION OF ITS GREEN BELT LAND in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3920  Respondent: 9045857 / Aaron Keddie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically, I am concerned and want to register my objections to the following:

1. **Removal of the villages from Greenbelt status:** The exceptional circumstances required before removing an area from the Green Belt has not be sufficiently demonstrated and the plans go against the recent instruction for areas within the M25 from Sadiq Khan for “no development on Green Belt land to be approved”. In a world were it is widely known that man is having a detrimental impact on the environment, why would we want to exacerbate and further contribute to the downward trend leaving a poorer world for our future generations to inhabit.

2. **Scale of proposed housing:** The inflated number of new houses proposed would give a population increase which is almost 70% higher than the official nation estimates for population growth in the borough. The scale of this increase is alarming - an increase of 35% in existing West Horsley households - greater than any other single area in the borough.

3. I object to the inadequate proposals around infrastructure which accompany the proposed substantial increase in housing in the borough. Specifically,
   1. **Traffic and Parking:** There is the potential for an additional 6000 or more cars within a 3 mile radius of the villages. This will make the already busy, narrow roads and lanes even busier, increasing the chance of accidents with people flying through the village at speed. The stations, shops and medical centre are already at capacity for parking and will not be able to cope with the additional volume. Finally, the very poor condition of our roads, which already cause damage and additional upkeep to our vehicles, will only increase due to volume and use.
   2. **Schools:** Local schools are already at capacity and no extra places are planned as part of the Local Plan development proposals. We live just 1 mile away from The Raleigh School in West Horsley and struggled to get our daughter into the village school due to the already high demand. Where do you propose all the additional children go to school?
   3. **Medical facilities:** The local doctor’s surgery is already at capacity and no extra facilities are planned as part of the Local Plan development proposals. With an increasingly elderly and very young population, sufficient medical facilities are critical.
   4. **Transport:** The commuting trains to London are already full and recent issues across the rail networks will only increase and affect more and more of us as commuter volume of use increases.
OVERALL I STRONGLY OBJECT TO THE PROPOSED SUBMISSION LOCAL PLAN

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3913  Respondent: 9045889 / Catherine Keddie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident in the village of West Horsley, I have carefully reviewed the Proposed Submission Local Plan which Guildford Borough Council has published for public consultation. My comments and objections are set out in this email.

Specifically, I am concerned and want to register my objections to the following:

1. I object to the scale of the proposed house building programme in the area, which is considerably larger than the previous plan proposed back in 2014 and over double that proposed back in 2003. The volume of houses proposed in this Local Plan would transform the character of the borough from mainly rural/Green Belt to urban.

2. I object to the inadequate proposals around infrastructure which accompany the proposed substantial increase in housing in the borough. Specifically,
   1. **Traffic and Parking**: There is the potential for an additional 6000 or more cars within a 3 mile radius of the villages. This will make the already busy, narrow roads and lanes even busier, increasing the chance of accidents with people flying through the village at speed. The stations, shops and medical centre are already at capacity for parking and will not be able to cope with the additional volume. Finally, the very poor condition of our roads, which already cause damage and additional upkeep to our vehicles, will only increase due to volume and use.
   2. **Schools**: Local schools are already at capacity and no extra places are planned as part of the Local Plan development proposals. We live just 1 mile away from The Raleigh School in West Horsley and struggled to get our daughter into the village school due to the already high demand. Where do you propose all the additional children go to school?
   3. **Medical facilities**: The local doctor’s surgery is already at capacity and no extra facilities are planned as part of the Local Plan development proposals. With an increasingly elderly and very young population, sufficient medical facilities are critical.
   4. **Transport**: The commuting trains to London are already full and recent issues across the rail networks will only increase and affect more and more of us as commuter volume of use increases.

3. I object to the Local Plan as it does not consider the impact on the Guildford Green Belt. 65% of new houses planned for the borough are to be built on Green Belt land. This goes against the recent instruction from Sadiq Khan for “no development on Green Belt land to be approved within the M25”. The proposed development programme will be sure to leave no rural communities for generations to come to enjoy and be part of which is criminal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed local plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield and for the proposals to East and West Horsley.

I moved to East Horsley in 1963, where my wife and I still live. We brought up our family of three children in East Horsley, who have given us eight grandchildren all of whom live in East Horsley. I am Treasurer of All Saints Church Ockham and my wife is the Organist and Director of Music. As you can appreciate we have a considerable interest in both the Horsleys and Ockham. My plea is to please do not ruin the area as is currently proposed in your draft local plan to which I strongly object for the following reasons:

1. I object to a plan which proposes over 70% of new housing to be built within the Green Belt.

   1. I object to the removal of the former Wisley Airfield from the Green Belt
   2. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too high.
   3. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.
   4. I object to the threat that the local plan poses to the historic rural village of Ockham.
   5. I object to the threat that the local plan poses, as it will have a massive influence on planning decisions in the Boroughs of East and West Horsley.

(a) The Boundaries for our villages will be greatly enlarged.

(b) The village areas inside these boundaries will be removed from the Green Belt.

(c) The Horsleys are likely to have more than 533 new houses.

   1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the all sites, both Ockham and the Horsleys.
   2. I object to the fact that air quality concerns have not been taken seriously, especially in Ockham
   3. I object to the fact that the proposed plans do not meet the needs of the local communities in both the Horsleys and Ockham.
   4. I object to the inclusion of the Wisley airfield site in the plan, where a planning application has been unanimously rejected.

To sum up I strongly object to the proposed major suggestion of altering the GREEN BELT, which we were assured by our MP was not a requirement of the Government.

Further the infrastructure in both Ockham and the Horsleys is totally inadequate to consider anything but very modest development as has been happening over the last fifty years. Even with this our infrastructure is under considerable pressure and without any development needs upgrading.

It must be appreciated that any major development at Ockham will greatly affect all facilities around that area especially the Horsleys.
The Plan must be amended.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 9046625 / N Mellstrom</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yet again I write to express my horror at the Guildford Local Plan 2017 with regards to its effect on East & West Horsley and Ockham.

It is utterly stupid to consider the vast quantity of housing you are recommending in your plan which will ruin our lives, yes that is most people's view. Do you not take notice of 300,000 objections to expansion into the Green Belt, which you already have? Clearly little notice is taken of objections and "common sense" has not been used. Please please do give more thought to your proposals. You know that the infrastructure of these areas was not built to take what we already have, let alone what you now propose. It seems pointless to go into detail as one gets the feeling that it not given proper consideration. The long and short of it is that this area is not suitable to take the proposals that you are considering. I and a vast number of people are strongly against it, please do give it more practical and sensible consideration.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
### Comment ID: PSLPA16/2877  
**Respondent:** 9046657 / Susan Finch  
**Agent:**

#### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am concerned about the number of houses that are wanting to be built in West Horsley, where I live with my family. I understand that some houses have to be built as it's working progress but not an extra 420! I'm concerned with the extra number of cars which will be on the road and the pollution, the roads aren't made for lots of cars, East Lane is in desperate need of being resurfaced, the turning by Ockham Road.

Where are all the extra children going to go to school? there are no places at the Raleigh and the Howard of Effingham. Drs appointments? The trains are already full, where are all the extra passengers going to go?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPA16/1642  
**Respondent:** 9047265 / Clare Hewlett  
**Agent:**

#### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I object to the proportionally large scale proposed development of West Horsley. An approximate increase of 35%, greater than any other single area within the borough. It would make more sense to increase the population in less sensitive urbanised areas where the infrastructure, especially transport and employment are to be found and brownfield sites can be used.
- You are incorrect to split West Horsley in two – it is one village with a separate character to that of East Horsley.
- The facilities in the village (West Horsley), such as they exist, (one shop, no Post Office, a very limited bus service, an oversubscribed primary school) cannot support a high number of new homes.
- East Horsley cannot be described as Rural District Centre on the basis that it has a ‘large supermarket’. Budgens is treated as a small shop or convenience store (less than 280m2) under the terms of the Sunday Trading Act 1994. Did the consultants visit the place?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6863  **Respondent:** 9047265 / Clare Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the total number of houses that are proposed for West Horsley which is disproportionate to its current size. In addition further houses are proposed for East Horsley which, together, will totally change the character of the local area.

- West Horsley Parish Council carried out a survey which established there was a local need for 20 additional affordable homes, not 385 additional homes.
- It appears that it is proposed that there should be a very substantial increase in the number of homes in West Horsley over the first 5 years of the plan, an increase of 35% has been suggested compared to 3% in Guildford, which is totally unacceptable. It appears that no effort has been made to use brownfield/previously developed sites.
- The local infrastructure cannot support such a rapid and large increase in houses. People currently have difficulty in getting appointments at the Medical Centre, the local State Primary school is oversubscribed, the nearest State Secondary school, the Howard of Effingham, does not always have places for Horsley children, the parking in the two villages for local shops, the library and the Village Hall in East Horsley is often insufficient. The car parks at the local railway stations are often full.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6864  **Respondent:** 9047265 / Clare Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The draft plan appears to acknowledge that ‘suitable, adequate infrastructure is crucial’ but does not adequately recognise the limitations of the current infrastructure for the current population, much less a rapidly increased number of homes in the first 5 years of the plan.

See above comments re school places, medical facilities, youth facilities and local parking.

The local roads, not wide and with narrow and partial pavements, will become even busier, especially at peak times, leading to congestion and pollution. The roads are already in a poor state so additional traffic generated by increases in housing will substantially worsen the situation.

The existing sewer system, which is already known to be struggling (in the past raw sewage has poured on to the roads around Green Lane in West Horsley during the heavy rains), will be unable to cope if a large number of additional houses is built.

Some of the sites suggested for housing are at risk of flooding – notably the land at the rear of Ockham Road North. Many pictures have been taken in the past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6862  Respondent: 9047265 / Clare Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of West and East Horsley from the Green Belt as this will inevitably lead to the total destruction of the special character of these villages as they are developed to become dormitories for Guildford and Greater London. The Green Belt was designed to safeguard against this.

No exceptional circumstances have been identified to justify the wholesale removal of many villages from the Green Belt. Indeed, our MP, Sir Paul Beresford received confirmation of the Government’s position from the Parliamentary Under Secretary for State (Planning) - “the National Planning Policy Framework makes it clear that most development in the Green Belt is inappropriate….unmet housing need is unlikely to outweigh harm to the Green Belt and thus constitute the very special circumstances justifying inappropriate development within the Green Belt”.

No case has been made for siting large numbers of new homes within West Horsley, which will totally destroy its rural character.

The National Trust opposes the removal of West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6865  Respondent: 9047265 / Clare Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that such a large area of the Green Belt is to be destroyed by the removal of its protection from so many villages. Surrey should not become a large dormitory for Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6861  Respondent: 9047265 / Clare Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of West Horsley and wish to register objections to the revised Draft Local Plan. I understand the need for some additional housing but feel that the proposals now being put forward are inappropriate in scale and have not been properly justified. Indeed I understand that even the Council itself do not know the basis on which the number of new homes in the Borough has been calculated, which cannot give any trust at all that it is a sensible number and not a developer’s wish list! A large number of new homes will provide a ‘pull’ factor into the area from Greater London which would not have existed otherwise. Such a demand will never be satisfied.

- I object to the manner in which a total figure of over 13,000 additional houses in the Borough has been presented with no justification of the actual need.
- I object to the fact that a very large proportion of the proposed new housing should be in the Green Belt and/or on agricultural land which will be lost for ever
- I object to the disproportionate allocation of housing to the Horsley area, the opposite side of the Borough from areas of economic development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9075  Respondent: 9049697 / Simon Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am representing St Mary’s Church, West Horsley, which has two adjacent properties at 80 East lane, West Horsley, KT24 6LQ These are St Mary’s Daughter Church, which you will see from Surrey Interactive has an ‘L’ shaped plot, and the adjacent Rectory (which itself borders farmland on its other side). (The two plots can also be seen on Site Allocation/Policy A41 and the map on Page 218 Of the Proposed new Local Plan For some while the Church has had internal discussions regarding ways to improve its facilities and planning for the future has become increasingly important as the Church grows and the influx of new residents into ‘The Horsley’s’ is set to significantly increase. So far, we have not reached any firm conclusions as to what we would like to do, but some form of improvement or redevelopment of the East Lane facilities is still high on our agenda for consideration. If any subsequent proposals required planning or any other consents, then all normal procedures would be followed For the time being however, we would be most grateful for your clarification and help. If you take the two properties together, they form a sizeable, almost square plot made up of the Rectory bounded on two sides by the ‘L’ shaped land upon which the Daughter Church sits. However, we have recently viewed a map which shows the new Settlement Boundary as part of the new Local Plan and it would appear that the bottom half of the Daughter Church land (i.e. the portion that runs along the back of both the Daughter Church and the adjacent Rectory) seems to be outside the proposed new Settlement Boundary. If this is the case, it could very significantly restrict our ideas in terms of improving the Church’s facilities; which of course are not only important for the Church members, but also the local community as a whole We would really appreciate it if you could look into this for us and confirm whether this is the case or not. If we are correct, then we would like to formally request as part of this consultation process please that this portion of our land is brought within the new proposed Settlement Boundary. If there is then a formal application process that we need to embark upon to achieve this, then please advise us and we would be pleased to follow your procedures

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9477  Respondent: 9049889 / Patrick Armitage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planning based on the visible inability of the local infrastructure to cope with the already increased number of local residents. I catch the train form Horsley station into London daily. Previously there would be room for all passengers on the platform, today there a lot more passengers boarding at Horsley and often no seats available- this is after the platform extension and before any development has started. It is clear that by adding another 500 houses in Horsley and 2000 at Wisley the rail network will NOT be able to service the needs of the local community.

In addition other local amenities of West and East Horsley, car parking, doctors surgery, primary school, sports clubs are full to bursting and cannot maintain with the current level of demand.

The Local Plan makes no reference to providing increased infrastructure to compensate for the extra cars, children and people.

Local roads are narrow and get busy during at school times, many children in the area walk, scooter and cycling to school. Increase the population will cause further congestion and puts children’s lives in danger.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removing East and West Horsley from the Green Belt.

The Green Belt was created to prevent urban sprawl, it is a precious resource which provides an ecosystem for numerous creatures and helps combat pollution. Furthermore by removing East and West Horsley from the Green Belt would change the nature of the area forever and be lost to future generations.

Under The National Planning Policy Framework requirements housing, education needs are NOT an exceptional circumstance. Under no circumstances should green belt land be used for housing or educational buildings.

I hereby respectfully request Guildford Borough Council to revise the current proposed housing number, and to amend the Local Plan to utilise brownfield and or previously used land rather than green field sites within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly object to Policy A35 and will provide a more detailed submission outlining my arguments against this policy in a separate letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

I am concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then I am broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst we endorse many of the requirements set out in Policy A36, our principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

I would only support development at this location if it has a significantly lower housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in ‘exceptional circumstances’. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, we consider these proposed movements in settlement boundaries to be invalid.
These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I object to the site allocation policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4142</th>
<th>Respondent: 9050337 / Nigel Geary</th>
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Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, I object to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8683</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8675  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8677  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these
applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
- EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
- EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
- EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the

I object to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8678  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8679  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8665  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8667  Respondent: 9050337 / Nigel Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough in an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

In summary then, I object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which gives me cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of
It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly object to the infrastructure proposals on these grounds. I further object to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8669  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8670  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:
a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

I object to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of
woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe

the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8672   Respondent: 9050337 / Nigel Geary   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8661  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I have carefully reviewed the proposed Submission Local Plan which Guildford Borough Council has now published for public consultation. Please see my comments below.

I am concerned about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by Guildford Council.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy, but unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore object in the strongest possible terms to this plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by our comments on specific site allocation policies.

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8664  **Respondent:** 9050337 / Nigel Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by myself, which unequivocally rejects GBC’s Forced Growth policy.

Therefore I object strongly to the borough housing targets set out in Policy S2.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe the assessment of housing numbers required to be mistaken (and too high). There have been countless requests to check the numbers but I do not believe there has been any robust or credible test to date. Even if the number was correct before 23rd June 2018 Brexit will demand a new revision (downwards). I do not believe it to be in the best interests of local residents anywhere in the borough for the council to agree such a radical transformation or destruction of greenbelt based on a questionable housing target.

The Metropolitan Green belt is more than a lovely gift from our forefathers - building on it means an irreversible loss of: agricultural production; Rural leisure and tourism amenities; Water catchment; Flood control; Biodiversity; Natural heritage; Natural landmarks; p2 open space; rural views - all of which bring very real benefits to public health and wellbeing, physical and psychological.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11138  Respondent: 9050529 / Suzanne Johnston  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The level and concentration of development cannot deliver economic, social or environmental conditions - the level of congestion is already high, mitigated only by areas of green belt. I believe the plan rides roughshod over greenbelt and as such will fundamentally change the character of the countryside here without delivering the benefits it promises.

I believe that the local plan is fundamentally flawed and should be much more rigorously tested before it is allowed to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/108  Respondent: 9050881 / Andy Los  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the excessive number of houses proposed at Wisley due to the already busy A3 and the lack of local infrastructure to accommodate the extra people. Our schools, medical centres and roads are already too busy.

I do not think the Horsleys should be removed from the Green Belt, this is an outrageous suggestion.

Finally I object to the development of the green site on East Lane in West Horsley.

Regards,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3685  Respondent: 9050977 / Stuart Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt**

I am appalled at the proposal to remove land from the Green Belt. This is against policy. The conservatives stood at the last election on a green belt protection pledge.

The manifesto says: “- ensure local people have more control over planning and protect the Green Belt” That says it all.

There is no valid exceptional circumstance to make removing land from the green belt acceptable.

**Infrastructure**

- Our roads could not cope with an increase of so many extra cars due to so many new houses.

Our amenities are for a small village. Parking at the shops would become a nightmare?

Our Railway Station would not cope with such an increase in parking requirement.

Our Medical centre is barely large enough to deal with the current population.

Our bus service is already very poor.

**Flooding**
I believe there is a plan to build on the area which suffers from flooding. The roads in this area already flood easily. **Building here can only make matters worse.**

**Schools**

The **Raleigh School is too small** for such a population increase. I believe there is a plan to move the school to another site. I believe this is also a flawed plan. If anything, the Raleigh should stay where it is and a plan is required to build another school if required.

**The loss of Green belt is NOT ACCEPTABLE.**

I am not in favour of the draft Local plan

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2694  **Respondent:** 9051617 / Carol Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6032  Respondent: 9051617 / Carol Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We need to protect the green belt. Green spaces are precious and we must look after them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6033  Respondent: 9051617 / Carol Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need to develop more Brown field sites into integrated variety sites

Homes- Starter, family, down-sizers, green, especially social;

Leisure and community spaces and places which are accessible by foot, cycle, car or public transport.

We are very lucky to live where we do, we need to share, compromise but not lose its fundamental greenness

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2693</th>
<th>Respondent: 9051713 / Margaret Mills</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected
Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter
generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the
world and the proposals to raid these precious areas is nothing short of outrageous.

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stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to
warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing
Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and
indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of
the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of
which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The
plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed
houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high
and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is
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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/324</th>
<th>Respondent: 9052129 / Sue Wright</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Draft Local Plan: Strategies and Sites June 2016**

Firstly, I think any estimates of numbers of new housing should wait until we see the impact of the UK’s exit from the European community has, hopefully net migration will start to decrease and then I doubt that so much new housing would be needed anywhere.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
General Observations about West Horsley

- There is a lack of state primary school places in the village, so if particularly social housing were built, where would these children attend school?
- Secondary school places are limited, we were under threat of our child attending the Bishop David Brown rather than the Howard when he was 11!
- Cranmore and Glenesk parking and traffic cause many traffic problems at various times of the day and on certain evening and weekend open days and events without more children attending.
- The Medical Centre in East Horsley serves both East & West Horsley and as a working couple we have extreme difficulty in getting an appointment to see any doctor early or late in the day, let alone our own GP. How would this cope with some 385 extra households in West Horsley let alone those planned for East Horsley?
- There is virtually no public transport through the village – from our property it’s a good half mile walk to the nearest bus stop along an unlit road, this would apply to the site earmarked for 120 homes near the Ockham Road North.
- The bus service to Guildford stops only at Bell & Colville roundabout so is pretty inaccessible to most villagers
- There is limited parking at East Horsley station for those wishing to commute 
- Most households would have 2, if not 3, cars which would put an intolerable strain on the roads.
- Drainage – this is poor in the area, anyone walking along Ockham Road North on a rainy day will know the footpaths are puddle ridden and heaven help you when a car passes.
- As previously mentioned, the manhole covers lift in wet weather – in Green Lane we have had raw sewage spill over the road in inclement weather presenting a health risk. If the 114 extra houses off Green Lane/Ockham Road North were built this would be much worse
- We have few facilities within West Horsley, with just a couple of shops and very little parking
- West Horsley residents need to use East Horsley’s facilities e.g. shops, library, doctors and there is limited parking there too.
- The additional housing would no doubt bring with it a huge amount of extra traffic and currently the roads in the village are already pothole bound in many places, with no sign of repairs being made.

All in all, this is an unsatisfactory plan for the village and representation should be made to keep East & West Horsley firmly in the Green Belt and resist this excessive housing plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries and cannot see any exceptional circumstances for insetting the two parts of the village from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/952</th>
<th>Respondent: 9052129 / Sue Wright</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

But I digress and will now continue with my objections relating purely to West Horsley and the erosion of the Green Belt.

Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes

- The proposed development of 385 homes – a increase of 35% of housing - at much higher densities than currently exist in the village settlement would be out of character with the existing mix, the layout of the village, it’s also unsuitable because of:

  Drainage - in Green Lane when it rains the manhole covers lift up and the storm drain flood the lane, walking along the Ockham Road North is dreadful after rainfall.

  Schools – the Raleigh is always full and is once again over-subscribed (the last new neighbours couldn’t get a place for their youngest child and I gather there are 23 others also waiting)

  There is an infrequent bus service in West Horsley (weekdays only) and should these additional people choose to travel by train and drive to Horsley Station, there is little parking there.

  There is one greengrocer and NO post office in West Horsley, with about 4 parking spaces for these.

  The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3805</th>
<th>Respondent: 9052673 / Beverley Nash</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. There is an ERROR in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will be opposed by residents and will not be granted by the Manor Close Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3804  Respondent: 9052673 / Beverley Nash  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules. The local infrastructure is already overloaded and will not be able to cope with the large number of new houses proposed.

2. I strongly oppose and OBJECT to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7166  Respondent: 9052673 / Beverley Nash  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. However I am supportive of re-siting The Raleigh School to site 41 (East Lane) and in return building houses on the current site of The Raleigh School and on Weston Lea.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4100  Respondent: 9054433 / George Rushton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objections to new Guildford Local Plan

We have lived in West Horsley for over 25 years and write to object to the new Guildford Local Plan as follows:

1. The exceptional circumstances required to remove the Horsleys from the Green Belt have not been demonstrated.

1. Our infrastructure is already overloaded with too many cars on our roads, stretched medical facilities etc.

1. In particular, the Ramada (Thatchers) Hotel development will rob the villages of much needed hotel beds and destroy an important building which has long been an important part of the character of the Horsleys.

1. It appears that the Bell & Colville development at least maintains the garage building, another important local icon which must be protected. However, the traffic around the Bell & Colville roundabout is particularly bad with long queues and the addition of a further 40 homes and 40+ cars accessing the road at that point will make a bad situation worse and should, therefore, be rejected.

1. As we understand it a company called Dandara are lobbying to have the fields to the south of Epsom Road reinserted for development. We should be strongly opposed to such a move which would represent a dangerous incursion of additional development into an area where it is critical for further major building to be avoided if the Horsleys are to maintain any semblance of rural character and the Surrey Hills are to be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2911  Respondent: 9056513 / Edmund Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Education/Employment
The local schools are all oversubscribed and new schools would also have to be built on Green Belt local land to cater for the ever increasing demand caused by the new developments. There are no employment opportunities in the area and the prospects of any in the future are negligible. Thus new residents would also have to commute.

Infrastructure
The roads in the area are typical of Green Belt countryside. They are narrow and consist of many bends and ditches. For a suggestion to provide walkways and cycle paths is laughable as particularly in winter months, these would be dark and dangerous as street lighting is not used in these areas. If introduced there would be a problem of light pollution and would not be in keeping with the rest of the community. The increase in housing would bring potentially 5000 more cars to the area, increasing the problems locally and at the Wisley Interchange M25/A3 also at the A3 Painshill Interchange. These junctions are at a standstill most mornings as early as 6am. Proposals for improvements to these areas are already too late and by the time they are implemented standing traffic would be an all-day occurrence. This will lead to more pollution, that we need our countryside, mainly trees to absorb, as any reduction in the amount of trees would increase the level of noise and pollution.

The resulting increase in housing and residents would further damage our wildlife and eco system with irreversible effects. The local road conditions are poor and dangerous at present with the volumes that we currently have. sewer problems are ever present and no increase in volume can be catered for. The renewal of these to Ripley would cause major upheaval and create massive problems to local people and wildlife.

There are no industries and only very small scale employers in the area and the likelihood is that this will not change. Thus, all new residents will need to commute to employment. Roads, trains and a poor bus service are already at capacity. The Doctor’s surgery is full, and parking at the local shops and station are also at full capacity. We would require a new Police and Fire Station to the area due to its increasing size. Increased demand would mean that Guildford and Painshill Fire Stations would not be sufficient.

I could write my thoughts endlessly but would like to sum up by saying:

The housing density for this area is wholly inappropriate and damaging to our community. The infrastructure, roads and transport links are poor. Drainage, foul and surface water is unable to cope with more development of this size and nature. The Plan is not made to deal with local issues and the developers /land owners only have one aim, profit at all cost.

Guildford Borough Council appears to have the same motive. All that they see is more Council Tax revenue and to hell with the consequences. I also note that most of the areas ear marked for development i.e. East & West Horsley do not seem to have any members of Guildford Borough Council living in the area so are being vigorously attacked as they do not want these developments on their doorstep. I have to raise these points as if we let our Green Belt land be developed our future generations will see it as “our fault” and I do not want that legacy. So I urge the Council to reconsider other options and therefore reject the proposals outright.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2910  Respondent: 9056513 / Edmund Crawford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Drainage/Surface Water

Our foul water mains drainage system is continuously having to be pumped and cleaned as it struggles to cope with the present demand. Therefore, new major development would need complete replacement. This would cause major upheaval of our road network and devastation to local wildlife. Surface water drainage would be further reduced leading to more flooding in the area. Many national studies prove that the increase in building further exacerbates this problem and no counter measures have proven to be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2909  Respondent: 9056513 / Edmund Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to object wholly to the Local Plan June 2016.

I will head my objections and then explain these objections in more detail.

- Policy, Site Proposals and NPPF Framework
- Housing Density
- Drainage
- Education
- Infrastructure
- Summary

Policy Site Proposals

I am horrified that the Plan targets the Horsley’s with a 35% increase in homes, the highest in the borough. This would remove the two separate villages from the Green Belt and merge them; thus increasing urban sprawl. The Government’s own Housing and Planning Minister, Brandon Lewis, stated housing demand is not enough to change Green Belt boundaries. The NPPF clearly states that inappropriate development is by definition harmful to the Green belt and should not be approved except in very special circumstances. This alone shows the Local Plan evidence to be flawed. The estimate for housing needs would bring more people into the Borough not providing local needs for those already here.

Housing Density
The density of proposed homes is far too great and would merge two existing separate villages into a town. This together with the proposal at Wisley (another town) would kill off our local community, with vast swathes of Green Belt lost forever. Many people visiting the area comment on its natural beauty and quaintness. This would also be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/879  Respondent: 9056705 / Linda Crawford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley I would like to object to the Local Plan 2016. My reasons are listed below:

HOUSING

I note that the Horsley’s have various sites marked for new housing totalling approximately 533 in number. Can anybody tell me why the Horsley’s, especially West Horsley, has been unfairly targeted for development? I understand that 40% of these homes have to be affordable. I would like to ask the question – what price is affordable in the Horsley’s when most of the homes in the village are in excess of national average figures? Developers are loathe to build affordable housing as their profit margin is low. The need for all of these affordable homes is not proven. The West Horsley Parish Council and Surrey Community Action Housing Survey in May 2014 identified a need for only 20 affordable homes within the village. It prompts me to ask how the figures for new housing are reached!

It would be a better alternative to build small new developments with a slightly different mix of houses on brown field land.

The proposed Wisley airfield development of in excess of 2000 homes would add to the sprawl and I anticipate a conservative estimate of 5000 to 6000 residents moving onto this site, flooding the roads. How is the entire infrastructure of the villages going to be able to cope with such large numbers?

The National Planning Policy Framework requires that new residential development MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

The same policy states that “As with Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

This leads me on to the

INFRASTRUCTURE

Our village is made up of mainly narrow country lanes not suitable for the number of cars that would be on the roads if all of the new building was to go ahead. The roads are not suitable for major traffic and are often flooded. Thames Water has advised Guildford Borough Council that it may not be able to support the demand for all of these developments and that the foul drainage system works would need to be upgraded in order to cope. Could someone please let me know if the developers are going to pay towards this cost or are we as Guildford council tax payers having to pay for something that very few of us want or need.
The local schools are full; traffic levels at certain times of the day are excessive. At school times the Raleigh school causes major congestion and parking problems and is an “accident waiting to happen.”

The only Doctors’ surgery in Horsley is full and the small local shops not easily accessible due to the limited parking. Transport links within the village are poor, buses commencing at 9am and running every hour. New houses would mean hundreds of additional cars using the lanes to access the M25 and A3. Has anyone looked at junction 10 on the M25 not just at peak times but also during the day? The roads are at a standstill and cannot cope with more traffic especially if the Wisley Airfield were to be developed with 2100 houses. Horsley railway station car park is normally full and as there is very little employment within the area, it is quite clear to see that most people need to travel by car or rail as the bus service is not suitable.

GREEN BELT

In setting of the villages would create an urban sprawl of housing and would be an extension of Guildford/Leatherhead. The villages would be “no more” but become large towns. The Green Belt is precious, should be protected and villages not inset. To remove most of the Borough’s Villages from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. It would be an environmental outrage.

The Green Belt preserves air quality, prevents flooding and is a joy to those that live in large towns and thus should be for us to conserve and protect it.

The residents of West Horsley are opposed to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. There are no exceptional circumstances for building on the Green Belt as the Guildford Borough Economic Strategy 2013-2031 states that “there is no case for large numbers of homes in West or East Horsley or neighbouring villages.”

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

For all of these reasons I must once again state that I object to the Local Plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10226  Respondent: 9059137 / E.U. Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to lodge my objection to the proposed plan to remove Chilworth and Shalford from green belt status..... this can be verified with her personally, she doesn't have email but wants her objection heard, pls acknowledge this has been accepted, Many Thanks

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9540</th>
<th>Respondent: 9059713 / J.M. Gamble</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I am much concerned that, if this plan is approved, development will be "approved in principle".

If this is so, it would appear to go against all ideas of local democracy. What mechanism will there be for any serious comments to be heard & considered in specific cases?

I understand the important need for housing, etc., but environmental considerations are also vital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPA16/3293</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
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We wish to object most strongly to the removal of Chilworth and other villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/13804</th>
<th>Respondent: 9061921 / Susan Hills</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I also object to the planned development especially as there is no planned provision for improvement in infrastructure which is already stretched to its limits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13801  **Respondent:** 9061921 / Susan Hills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to plans to remove Horsley from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5415  **Respondent:** 9062433 / Lisa Griffiss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I would like to lodge my objection to the Guildford borough Council proposal to remove Green Belt protection from a number of villages in the Guildford area. It is proposed to include Chilworth in this plan.

This village has reached saturation point with the huge amount of new housing that has gone up over the last few years and building on the remaining green fields would turn the village into a Guildford suburb and ruin its character.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
### POLICY D1 Making better places

PART SUPPORT, PART OBJECT I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.

There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPP16/11470  Respondent: 9062913 / Susan Parker  Agent:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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POLICY D2 Sustainable design, construction and energy

Generally OBJECT  The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11471  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 Historic environment

PART SUPPORT, PART OBJECT  The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11472  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 Development in urban areas and inset villages

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11440  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 Meeting employment needs

OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11444  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
### POLICY E2 Location for new employment floorspace

**OBJECT** I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11446  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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### POLICY E3 Maintaining employment capacity and improving employment floorspace

**OBJECT** I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11449  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
POLICY E4 Surrey Research Park

OBJECT I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11452  Respondent: 9062913 / Susan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 Rural economy

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11455  Respondent: 9062913 / Susan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 The leisure and visitor experience

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11457  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11460  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 District centres

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11462  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 Local centres

OBJECT I do not think that retail development adjacent to the 6 rural centres is appropriate.,nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11425  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
POLICY H1 – Homes for all

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I must object overall. We support high density development in the urban area. Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11426  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11427  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H3 – Rural Exception Homes

OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e., normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11473  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY I1 Infrastructure and delivery

OBJECT. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11474  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 Supporting the Department of Transport’s “Road Investment Strategy”

OBJECT This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11475  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 Sustainable transport for new developments

OBJECT I support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered,

- It is not sustainable to build dormitory towns and call them sustainable.

Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process- the further from the town centre, the less sustainable the development will be.
Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.

While I welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY I4 Green and Blue infrastructure**

OBJECT The Policy shows concern for conserving and enhancing biodiversity, which is welcome. I also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

OBJECT This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11429  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 – Green Belt

OBJECT We object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11432  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P3 – Countryside (ie countryside beyond the Green Belt)

OBJECT. This seems *more* protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. Note – I am *not* in favour of building on this area. I think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies *stronger* policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4: Flood risk and water source protection zones

OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5: Thames Basin Heath Special Protection Areas

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11423  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 – Presumption in favour of sustainable development

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11424  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11566 Respondent: 9062913 / Susan Parker Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of all Green Belt sites, and particularly the following sites, on the basis that (per the policy objections listed above) the need for use of Green Belt land is unsustainable and exceptional circumstances have not been adequately demonstrated for their removal from the Green Belt, as required by NPPF 83 inter alia:

A25 Gosden Hill
A26 Blackwell Farm
A35 Wisley
A38 – A41 Land around West Horsley
A42 Clockbarn Nursery
A43 Garlicks’ Arch
A43 a Burnt Common
A44 Send Hill
I object to the changed policy A25 Gosden Hill for the development of 1700 homes. Deferral of the target number of homes by 300, to be built after the plan period, is effectively just a smoke and mirrors exercise. This housing is still being allocated.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Ripley through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3697  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. As for Gosden Hill, the deferral is not a genuine reduction but merely a presentational exercise.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.
The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3702  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

Previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was underwater during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3713  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the changes to Policies A36 to A41 (East and West Horsley)

The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3716  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the changed policy A42 Clockbarn Nursery to 60 homes.

It ignores all the hundreds of previous objections made by local people

The increase to 60 homes in place of 45 homes is 33% more and too much.

It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
It will make erosion of Green Belt worse.

It will make surface water flooding, which is already bad, even worse.

It will impact open countryside views from the River Wey Navigation.

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

It ignores all the thousands of previous objections made by local people

There is no proven demand for travelling show people plots in this location

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted.

This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.

The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1869  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change by way of deletion of paragraph 4.5.8 : “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design. …

There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1855  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

· It is effectively an old non-conforming user in an area of outstanding countryside.
· It is adjacent to the beautiful Wey Navigation.
· There is highly restricted vehicular access along Tannery Lane in both directions.
· Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision.

- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017.

- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units.

- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt. There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

- The impact on small surrounding roads will create traffic gridlock.

- It will join up existing villages and defeat the purpose of the Green Belt.

I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for
industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1856  Respondent: 9062913 / Susan Parker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

This fails to provide sufficient public consultation in relation to access and traffic flows

This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1857  Respondent: 9062913 / Susan Parker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1864  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4: SURREY RESEARCH PARK

I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business
parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

The Surrey Research Park currently extends to 65,000 sq m.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the changes in Policy E7 Guildford Town Centre

I consider that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.
However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungsate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough.

There is still a blind overconcentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.
I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at
the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all
new development will be of the highest design and environmental standards. We will be proactive in building a great town
centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put
people above traffic and we will promote new high quality retail and business development. To achieve this we will
develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we
will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a
decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for
imaginative Town development in this latest draft plan.

I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to
fully exploit the development potential of the Town Centre it did include many good ideas including more extensive
brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for
housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town
which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of
urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an
absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015
which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has
the capacity for at least 5,000/7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity
for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be
  increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University
campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

We need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate
our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the
town before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by
encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a
brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on
previously developed land are given fast track priority and every facility to promote development for residential purposes
and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for
all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bed spaces on campus.”

The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

I object to the change in relation to Gypsy, Traveller and Travelling Show people pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

I object in particular to the inclusion of 6 Travelling Show people pitches at Garlicks Arch where there is no proven need. I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1920  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1843  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for
Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1844  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy H3 Rural Exception Homes. I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Home choice (or equivalent scheme).”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1871  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID1 INFRASTRUCTURE AND DELIVERY

A new Transport Topic Paper has been published by GBC. Items 3.16 and 3.17 (page 10) mention Highways England concerns regarding the Strategic Highway Assessment Report 2016 and two letters. These letters can be accessed from the “Get Involved” website by searching for the Highways England response to the consultation. It seems clear that further modelling will be undertaken before the Examination and it also seems unlikely that it will be consulted on. We consider that any further modelling should include more detailed information so that it can be subject to scrutiny by GBC and the public.
The wording of ID1 has been amended to give an impression that provision of adequate infrastructure will be enforced. However, the reality is that GBC will not determine the required infrastructure. It will be determined by Surrey Highways for the local road network and they are required to support development – not put obstacles in the way. If the Strategic Highway Assessment Report is anything to go by, the requirements will be understated or not even recognised. Transport assessments supporting planning applications will be prepared by consultants acting for, and remunerated by, the applicant. Improvements to the strategic road network (e.g. A3) will be determined by Highways England, budget constraints, and ministerial decisions.

Cllr Furniss has stated that the proposed Blackwell Farm development will not depend on A3 widening (in response to a question from Karen Stevens to the Executive Advisory Board meeting held on 20 April). It seems likely that Highways England have felt the need to offer a reality check on the likelihood of major work on the A3, such as widening or a tunnel, in the foreseeable future – apart from improvements to two slip roads.

The policy states that infrastructure will be secured by planning condition and/or planning obligation but this will require enforcement and we doubt the ability and willingness of GBC to overcome developers’ viability arguments. For the permissions that require a longer timescale there could be non-delivery issues if the original developer abandons the project without fulfilling all the conditions and obligations. Item 4.6.8 still indicates that GBC will be prepared to reduce infrastructure requirements by negotiation. I.e. viability for the developer will take precedence over infrastructure.

No change has been made to the monitoring requirement which is based on CIL receipts and spending rather than actual, and timely, delivery of infrastructure.


I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. The A247 link road to Woking already at capacity will become gridlocked.

I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1872  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The removal of item 4.6.17 is puzzling. In the rationale for changes it is described as a potential statement of common ground with Highways England. It is not clear whether GBC believe that it is likely to be agreed nearer to the plan Examination – but once again it highlights the lack of control over key roads infrastructure in formulating the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Item 4.6.20 makes a statement that is clearly at odds with the choice of sites which will generate a major increase in private motor vehicle journeys.

Appendix C Infrastructure Schedule

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility). (E.g. those in LRN7).

LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Biodiversity Opportunity Areas (BOAs) seem to have been heavily influenced by the proposal of new identified settlement boundaries, in this draft local plan. The proposal in themselves have not been fully considered; they threaten landscape and biodiversity.

Biodiversity will be seriously damaged by the many greenfield development sites proposed. We are suspicious of the use of the phrase “where possible”, which is a let-out.

Important habitats for biodiversity (outside BOAs) include many which are not adjacent to BOAs. There is no proper concern for protection of such areas.

4.6.45 is misleading. The primary ostensible role of SANGs is to divert recreational use, and dog-walkers in particular, away from the TBHSPA.

It is extremely doubtful whether new SANG will achieve its primary purpose. For example, dog walkers are being encouraged to use sites occupied by ground-nesting Skylarks. It is wrong to claim, in effect, that SANG will produce net gains in biodiversity when it will be used to justify the destruction of existing wildlife on greenfield sites by building on it.

Land used for SANG should be made attractive in order to divert recreational use away from the SPA; but this cannot be achieved by a SANG which is adjacent to the SPA or many of the sites proposed.

I object to the introduction of 4.6.49a which appears to be an afterthought to weaken the policy.

Existing biodiversity and recreational use is being ignored by Guildford Borough Council and developers in selecting sites.

In practice, SANG is being used in order to avoid any restriction on housebuilding due to the SPA; and is effectively a Trojan horse. Furthermore, all such sites are by definition already green spaces with either biodiversity or recreational uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1845  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
Support the rural economy of the Surrey Hills area
Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

• It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation.
• It should not be given the opportunity for further expansion or development

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”.

This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I are deeply disturbed that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

Many of the local village should not be removed from the Green Belt. Send, for example, provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

1.1 **I object** to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

The land behind the schools including playing fields and woodland.

The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into practice in forming this plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1840 **Respondent:** 9062913 / Susan Parker **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

The OAN “objectively assessed need” figure of 12,426 is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However, it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.
The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 overestimates population growth for Guildford.

The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

Around 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.
Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1915  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1925  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

It appears that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

I feel much of the updated local plan still appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
(From Summary) I consider it is not sound. The changes do not take account of previous objections including the 32,000 other valid objections that are shown on the GBC website as made to the previous 2016 version. In terms of appraisal of the Local Plan it is vital that those objections are fully regarded, since many have not been taken on board……

(From section “Why This Plan Is Still Unsound”)

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, fails to consider that constrains development or that make greater use of brownfield or previously released greenfield land. Focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

Under this amended policy it is clear that the OAN should be constrained.

The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. The plan fails to produce a coherent development strategy for Guildford Town. GBC has
deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/358  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As requested, this response reflects only comments on changes to the previous draft; both in terms of new text and also comments on deletions which lack acceptable justification. This is as a result of a specific instruction as given by the GBC Executive that only comments on changes will be acceptable.

As a result, I request confirmation that all of the objections to changes made below will be put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and also that all the previous objections to the 2016 draft plan made will be placed before the inspector and that when objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

Guildford is a constrained borough. 89% of its area is zoned as permanent Green Belt. The road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10535  Respondent: 9063393 / A.M. Brain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

388
I am strongly against the plan to lift Green Belt protection from the village of Chilworth and parish of St Martha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2387  Respondent: 9063457 / C.A. Brain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am strongly against the plan to lift Green Belt protection from the village of Chilworth and parish of St Martha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2554  Respondent: 9064481 / M Bystram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to object to the removal of Chilworth village from the green belt protection this is totally unacceptable and must not be allowed to happen, please could you register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4211  Respondent: 9066625 / Kate Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I am writing to oppose the above plan and what it means for the Horsleys.

As a resident of West Horsley I am horrified at the thought of building another 385 houses. We moved here because it was in the green belt, we moved here because of the beautiful countryside, a wonderful place to raise our children. To build a further 385 houses will completely change this village, making it a very different place to that of when we moved here. It will lose its wonderful community feel, a huge reason why we want live here.

My understanding is that there needs to be 'exceptional circumstances' to take us out of the green belt. Everyone in the village is wondering what these are? To my knowledge none have been communicated. This opens up our village to any number of problems with developers ruining our countryside, taking away such beautiful countryside enjoyed by so many in the village and outside of it.

If these plans did get through, surely there would have to be further plans to support this many houses, increasing further building. Our school is one example, the village already suffers with waiting lists for the Raleigh school. My family personally suffered when our son could not get into the school for two years, we live just over a mile away and were forced to use a school out of the village. Building these houses will have a huge impact on the school and local children will suffer. Building another school will not help, it's just more building and more houses on the original sight!

The medical centre is already stretched. Roads will hugely suffer.

Building these houses will be devastating to myself and my family. It is wrong for the Horsleys to be removed from the Green belt.

Furthermore, the development of over 2000 houses in Ockham will also put a huge strain on our village.

I know you will have received so many emails repeating what I have said. I am sure many can quote all the facts and figures in a better way than myself. What is important is that almost everyone in this village is against this plan proposing such an alarming increase in housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This is a proposal that will have a hugely significant effect on West Horsley and I strongly object for the following reasons:

This village is no longer a quiet rural backwater. There are heavy volumes of traffic and the existing roads are badly maintained and can barely cope. A 35% increase in the existing number of houses will obviously lead to significant further difficulties.

The general infrastructure is now stretched to capacity. The medical centre can barely cope, the railway carpark is full at peak times.

There is no additional capacity at the Raleigh school nor any of the other local state schools.

Guildford Borough Council must stand up to Central Government and reject this plan otherwise West Horsley will be irreparably damaged.

Enough serious damage has already been caused by infills and the construction of dwellings which are entirely unsympathetic to their surroundings. An outstanding example of this is the vulgar monstrosity constructed recently behind Charles Cottage in Silkmore Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3056  Respondent: 9068161 / B Crosta  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to oppose the proposal to remove the Green Belt protection from some of the villages in the Guildford area. As a resident of Chilworth for the past 15 years I feel very strongly about the traffic situation in and around Chilworth, Shalford and the traffic that approaches from the Peasmarsh direction.

If future development is granted in these villages roads will become even more unbearable than they currently are at peak times and in the case of the Shalford to Guildford road at any time of the day. It is absolutely absurd that it regularly takes 45 minutes to do a 5 minute journey. Safety of school children in Chilworth is already compromised with cars parked all along the road at pick up and drop off, more houses will mean more children and more cars and the higher risk of an accident to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2309  Respondent: 9069121 / E Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I am writing to oppose the proposal to remove the Green Belt protection from some of the villages in the Guildford area. As a resident of Chilworth for the past 15 years I feel very strongly about the traffic situation in and around Chilworth, Shalford and the traffic that approaches from the Peasmarsh direction.

If future development is granted in these villages roads will become even more unbearable than they currently are at peak times and in the case of the Shalford to Guildford road at any time of the day. It is absolutely absurd that it regularly takes 45 minutes to do a 5 minute journey. Safety of school children in Chilworth is already compromised with cars parked all along the road at pick up and drop off, more houses will mean more children and more cars and the higher risk of an accident to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing in response to the **Proposed Submission Local Plan: strategy and sites 2016**. I am incredibly worried by the impact that losing the protection of being within the Green Belt would have on the wild spaces that have hitherto been protected. The natural environment around Chilworth and Shalford is what makes this area such a valued place for people of Surrey and beyond.

I am also aware that the Guildford Environmental Forum have pointed out that:

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt...”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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There are a number of buildings left unoccupied all around the Guildford area and it seems criminal to create further environmental problems by new builds. Indeed it seems to serve corporations who wish to make a profit as opposed to providing homes for people who cannot find affordable housing in this area.

With the lack of opportunity for peer review of the process, let alone public examination of it, the document and its conclusions cannot be considered to be “objective”. Any plan based on this must be considered to be unsound and I therefore object to it in the strongest terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2991  Respondent: 9070145 / Don Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roadways are in a shocking state of repair and any proposals to build in the area will only see further degradation of the highways. The roads cannot cope with the present throughput of traffic. There are currently insufficient parking spaces in the station car parks and in the village shopping area and medical centre. Any increase in population will only add to the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2993  Respondent: 9070145 / Don Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As you probably gather I am against most of the proposals, although recognise there is a requirement for some small developments to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6076  Respondent: 9070145 / Don Harris  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the building of over 2000 houses on the former Wisley Airfield. This will destroy Ockham conservation together with the impact on listed buildings and will create a major impact on the Horsleys, Effingham and Cobham. This project would contribute to major traffic chaos that already exists on the A3 and M25. Local roads will be unable to cope with the additional volume of traffic. There is no existing public transport and the railway stations are some distance away. I gather that it has been suggested that residents will be coached to Effingham and Horsley stations. With the school coaches on the same roads can you envisage the absolute chaos that will prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pollution: I strongly object to the new draft plan proposing additional 2000 homes at Wisley, 2000 at Gosden Hill Farm, nearly 600 in The Horsleys and 400 at Garlicks Arch as it will have a great impact on the local road network which at peak times is already struggling. The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the borough. Additional noise and air pollution will be inevitable with this increase in traffic and it will have a significant impact on our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to advise of my objections to the new Guildford Borough local Development plan recently published.

Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the Green Belt. The new mayor of London has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won't be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant life which will be inevitably affected by the erosion of the Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8714 Respondent: 9070241 / Adrian Butler Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flooding: I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. Building on such land will only exacerbate the problem. Our drains can't cope now causing chaos on our local roads during heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8689 Respondent: 9070241 / Adrian Butler Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate number of new houses for local facilities: I strongly object to the number of new houses proposed within the Horsleys and surrounding villages namely Ripley, Send and Clandon. Within the Horsleys, the schools, doctors and train stations are struggling to cope with the current demand. My family commute to London from Horsley and the trains and car parking are almost at maximum capacity. Assuming that every new house has at least two cars, this means potentially 6000 more cars within a three mile radius of the villages. The impact on the local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will be affected.
The proposed development plan is disproportionate to the size of the villages and is an overkill. It is by directly out of proportion to the size and availability of Brownfield sites already available for development.

I sincerely hope you, the council, will consider my objections and avoid destroying the Borough's Green Belt which is precious and I fear for its demise. Our British countryside needs to be protected for future generations of population, animal, bird and plant life. Please protect our environment from increased pollution and flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In addition to the tragedy that would the the removal of the Horsleys from the Green Belt, the following is also true:
- an increase of housing by 385 homes is totally out of any sensible proportion.
- schools and station car park (and even the village centre car parks) at at maximum capacity now and a big increase in houses will cause huge problems in these areas.
- the proposed sites in the villages are a much higher density than the village is now, and therefore not in keeping with the village feel.

That said, I understand some level of development is necessary and I have made suggestions in my previous letter. 40 houses maybe, not 400!

Please focus on opportunities to develop in and around the towns and keep our borough villages great and green! Any other approach would be a disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As you know, this is not the first time I have lodged an objection against your plans and am once again dismayed to find ourselves in a position to do the same again so soon after the previous occasion.

My primary reasons for objecting are unchanged:

1. The suggestion to remove East and West Horsley from the Green Belt is an absolute disgrace and the Borough Council should be ashamed of such a suggestion - GBC as custodians of this wonderful borough should be endeavouring the preserve every inch of green belt it has.
2. I fail to believe there are not many, many better solutions available in and around the towns of this borough that could be used as development sites for a large number of these proposed houses. I am sure building on brownfield or previously developed sites costs more than greenfield site, but is cost alone a good reason to destroy the Green Belt? No.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3582  Respondent: 9072545 / Anna Botting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of new houses proposed in West and East Horsley (and the Wisley airfield for that matter) on the following grounds.

1. our daughter is 9th on the waiting list for our nearest Horsley school (The Raleigh). How much worse will it get?
2. I often cannot park at Horsley station. How much worse will it get? This is a commuter belt. You will make it impossible for people to live and work here.
3. We moved to the area for green fields, amenity space and fresh air. We chose not to live in Suburbia. You are proposing to allow the beginnings of urban sprawl.
4. As a Geography graduate, who studied Ebenezer Howard's 'Garden cities of Tomorrow' I am a real believer in Green Belt's as a mechanism for preventing the aforementioned urban sprawl, which allows amenity for city dwellers, (London) as much as for those who live in the villages and settlements within the green belt. Just because Govt allows building in the Green Belt, does not mean councils should be so short-sighted. The green belt helps sustain the AONB of the Surrey Hills in this area.
5. There are more appropriate sites, which are closer to towns, or more built-up and would be less radically affected by building works.
6. Traffic along the busy roads of the Street, Ockham Road N and S, and the roads through Clandon would increase - they are already fast and over-congested given the number of properties which are directly accessed from them - and the number of cyclists who choose this area for their sport.
7. There is a need for affordable housing. The houses in the Horsley's, on the open market, would soon not be affordable. This is a wealthy area and inappropriate to meet that need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/399  Respondent: 9072609 / Jane Brider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to register my objections to the above.

1. I wish to object to West Horsley being removed from the Green Belt as it is and ANOB and part of the Surrey Hills.

1. I would like it noted that in Policy P2 it states "We will continue to protect the Metropolitan Green Belt against inappropriate development". I believe that the proposals are inappropriate development.

1. As a former resident of Northcote Crescent, West Horsley and a victim of sewage flooding I am well aware of the failings in the local drainage system and to my knowledge none or very little has been done to improve this. As such there is no capability to take more waste away from any new development in the area.

1. Also living by The Raleigh School I know that there is no more capacity to expand on the current site to accept a bigger intake.

1. Transports links are very limited and as many roads merge into one lane in East and West Horsley at some point they would be unsuitable to take more cars let alone more buses.

1. Few roads have pavements so for those walking safety would be compromised by more vehicles on single lane local roads.

1. Our local shop is closing, one of the reasons being the lack of parking for customers and no prospect of increasing parking, another of our essential facilities gone, along with our local Post Office in West Horsley.

1. Long waiting times at Horsley Medical Centre, these would only increase with a larger patient list. It would also effect to those needing the Royal Surrey Hospital and other medical services as waiting times would therefore be longer as more people living in the areas.

1. I do not believe that so many houses are needed and believe that a limited amount of affordable homes may be required for the young and elderly of West Horsley. A conclusion made by The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4389  Respondent: 9078881 / Jean Trickett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to the 2016 Draft Local Plan as follows:-

1. **LACK OF A DETAILED PLAN FOR IMPROVING THE ESSENTIAL INFRASTRUCTURE**

This is key to ANY future development and yet there are no detailed plans for improving the infrastructure contained in the Draft Local Plan. This should come before any building and most importantly should include a TUNNEL which would need to be constructed before any redevelopment of Gosden Hill could EVEN BE CONSIDERED.

If a tunnel is not built then nor should ANY new houses be built on any of the following sites:-

- Gosden Hill
- Send
- Garlick's Arch
- Ripley
- The Horsleys
- Wisley Airfield*

N.B.

THE 4-WAY JUNCTION PROPOSAL FOR BURNT COMMON WOULD DO NOTHING TO ALLEVIATE THE TRAFFIC CONGESTION BETWEEN RIPLEY AND THE SOUTH SIDE OF GUILDFORD, EITHER ON THE A3 OR IN THE TOWN CENTRE.

* Why is Wisley still included in the Draft Plan even though GBC councillors turned down the latest application???

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
HOUSING NUMBERS - far too many houses are being proposed with no reason given as to WHY THE NUMBER HAS DOUBLED since 2012.?? Where is the evidence that 14,000 new homes are required???

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC must insist that the UNIVERSITY complete the building of the student residences for which they have held planning permission for a number of years as this will help to alleviate the demand for rental properties in the Town and make more rental properties available for essential workers and non-student residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed to the ANY OF THE 14 VILLAGES named on the Plan being "INSET" as this will inevitably lead to more development and further loss of the Green Belt. Village boundaries should NOT be increased to allow developers to propose even more sites than have already been identified by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LOSS OF THE GREEN BELT

GBC say they want to protect the Green Belt - how do not see how proposals to build 14,000 new homes will achieve this, quite the opposite in fact

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2052  Respondent: 9078881 / Jean Trickett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LIMITED CONSULTATION PERIOD

Far too short, and therefore undemocratic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4529  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Infrastructure Schedule – Appendix C

3.147. **Object (not effective nor justified in respect of NPPF paragraph 182)**

3.148. WPI does not wish to make extensive comments on the proposed infrastructure schedule, as outlined in Table 3.2, the majority of the planned infrastructure provision is supported. WPI questions the evidence base and scope for the delivery of certain items.

3.149. **AM3 (off-site Cycle Network)** – In accordance with WPI’s comments with respect to the draft allocation A35, the infrastructure provision should be deleted.

3.150. **SED2 (Secondary Schools)** – The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be determined.

3.151. **ES1 (Police Infrastructure)** – Neighbourhood policing centre to be potentially accommodated in conjunction with other community space provision. Delete reference to size.

3.152. **HSC4 (GPs and Dental Surgeries)** – Replace “GP surgery with pharmacy” with “appropriate healthcare provision, potentially including GP surgery with pharmacy”.

3.153. **BT2 (Bus Interchange at Effingham Junction)** – Make clear that a bus interchange could be provided in Horsley village, in close proximity to the station.

3.154. **WS1 (Water Supply)** – Procurement of new water supply (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991. Developer contributions are generally offset against future revenue.

3.155. **WCT1 (Wastewater connections and treatment)** – “Procurement of new sewerage (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991. Developer contributions are generally offset against future revenue.

3.156. **WCT2 (Wastewater connections and treatment)** – Sewage treatment capacity should be provided by Sewerage Undertakers for the planned development in the STW catchment. Any necessary upgrades are normally funded by the Sewerage Undertaker through the AMP process agreed with Ofwat every five years.


**Changes Sought**

3.158. **AM3 (off-site Cycle Network)** – The infrastructure provision should be deleted.

3.159. **SED2 (Secondary Schools)** â€“ The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be determined.

3.160. **ES1** – Neighbourhood policing centre to be potentially accommodated in conjunction with other community space provision. Delete reference to size.

3.161. **HSC4** – Replace “GP surgery with pharmacy” with ‘appropriate healthcare provision, potentially including GP surgery with pharmacy’.

3.162. **BT2** – Make clear that a bus interchange could be provided in Horsley village, in close proximity to the station.

3.163. **FRR3** – Consider whether infrastructure measures WS1, WCT1, WCT2 and FRR3 are required in the GBLP.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Please find enclosed representations on the Proposed Submission Local Plan: Strategy and Sites, submitted on behalf of our client, Wisley Property Investments Ltd (WPI).

The Council will be aware that WPI control land at Wisley Airfield, which has been proposed for allocation within draft allocation A35 in the Proposed Submission Local Plan.

The Representation highlights and where necessary expands upon representations submitted by WPI at the Issues and Options stage of the Local Plan process in November 2013 and the subsequent Strategy and Sites consultation in September 2014.

The representations provide further technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35). The proposed allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

WPI’s representation is structured in the same order as the draft GBLP. The representation conveys the due merits of land at Wisley Airfield throughout. An executive summary is provided. The representations are supported by 11 technical appendices. These include relevant appendices which act to support the proposed allocation of a new settlement, and demonstrate that all of the reasons for refusal associated with the planning application (ref. 15/P/00012) are either capable of being addressed, or have been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160715 Local Plan Reps - July 2016_and Appendices.pdf](160715 Local Plan Reps - July 2016_and Appendices.pdf) (11.0 MB)
Executive Summary

- Wisley Airfield represents an exceptional development opportunity for a new countryside community. It is the proposed new sustainable settlement within Guildford Borough. Wisley Property Investments Ltd (WPI) strongly supports the draft allocation of the Wisley Airfield site for a sustainable residential-led development of a new settlement (draft Allocation A35) within the pre-submission Guildford Borough Local Plan (GBLP). The draft allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will result in the delivery of homes to meet the urgent and pressing needs.

- The Masterplan and Design Vision for Wisley was first submitted to Guildford Borough Council (GBC) in December 2014 (planning application reference 15/P/00012). The Masterplan has been further enhanced following representations made on the application. The Masterplan has been created following over three years of work, as informed by ongoing engagement with key consultees, stakeholders and the public. This is shown on the Concept Plan included within these representations (Appendix 2). WPI held a series of public engagement events in May 2014, and has hosted Project Engagement Panels. In addition to the comments made in 2014 (63% of respondents were either neutral or positive about the proposals), updated telephone surveys undertaken in March 2015 indicate that 46% of respondents support the proposals, and 16% are neutral. A further street survey undertaken soon afterwards demonstrated 65% support for the proposals. Most recently, a public survey undertaken in May 2016 of people under 40 demonstrated 76% as either supportive or neutral and only 15% against the proposed development, with 76% believing that there are too few affordable homes in the Borough (see Appendix 10).

- With over 70 acres of concrete/hardstanding, Wisley Airfield contains the largest previously developed site within the present Guildford Borough Green Belt. Out of all the strategic sites allocated within the GBLP, in its entirety, it contributes the least to the four purposes of the Green Belt, is outside the AONB and is least constrained by highways (see Appendices 3 and 8).

- Based on the updated ‘objectively assessed housing need’ of 693 dwellings per annum (as identified within the September 2015 SHMA), GBC proposes an achievable suite of development allocations, and proportionate amendments to the Green Belt boundary, including new areas of Green Belt. This will facilitate the land supply over the plan period. The Wisley new settlement can deliver circa 210 dwellings in the next five years of the plan period (2016-2021). This figure has been adjusted to allow for the implementation of the significant green infrastructure provision (Suitable Alternative Natural Greenspaces - SANGs), and reflects the prospect of a resubmission planning application alongside the progress of the GBLP.

- The Wisley Airfield site is an obvious location for growth and, as an assembled site, it is available for immediate development and could make a significant contribution to Guildford’s five-year housing land supply.

- A community of approximately 2,000 homes at Wisley Airfield would be fourth in the Guildford Borough settlement hierarchy, providing the sustainable services and amenities associated with a Sustainable Settlement (see Appendix 8).

- The settlement would deliver around 6,000 sq m of employment and retail floorspace, potentially accommodating some 350 full time equivalent permanent jobs (on top of those employed in the development’s construction) and include facilities to support home working, further reducing travel demand. Additional consumer spending in the local area (excluding housing, fuel and power costs, VAT and leakage), based on 2,000 dwellings, would be around £31.86m per annum. The Housing & Planning Act 2016 makes clear that financial considerations are relevant material planning considerations.

- The development would complement existing villages, providing additional, well connected local infrastructure including a new primary and secondary school, leisure and health provision. This would relieve the pressures on overstretched existing services and amenities, such as schools, and contribute positively to the Surrey County Council (SCC) Surrey Infrastructure Strategy (2016) and the Appendix C Infrastructure Delivery Schedule of the GBLP. The new settlement would, in particular, address wider education needs, as outlined in Appendix 5.

- Wisley Airfield is within five miles of nine mainline railway stations including Woking. The development would provide in-perpetuity bus provision, secured through a Community Trust, potentially delivering a 7-10 minute target frequency (see Appendix 11). This would greatly improve sustainable transport access both to the development and to the local villages.

- Wisley Airfield has consented direct access onto the strategic road network at the A3 Ockham Interchange. Its development would provide a package of measures, deliverable in the short term, to directly improve a section of the A3, significantly reducing accident costs and improving journey time reliability for the region. Transport modelling, based on the SCC ‘SINTRAM’ model, confirms that its proportional contribution towards improvements at M25 J10 would assist in reducing congestion and improving safety. The new settlement would...
complement the proposed Road Investment Strategy 2 (RIS 2). The relevant transport technical background is provided in Appendix 3.

- The Wisley Airfield site would be a sustainable, successful place that promoted wellbeing, developed by understanding what people need from the places where they live and work. The proposals engender social sustainability by combining design of the physical realm with design of the social world – infrastructure to support social and cultural life, social amenities, systems for citizen engagement, and space for people and places to evolve. The sustainable communities created would meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice.
- The new settlement would also enable the delivery of significant SANGs. The SANGs Strategy submitted with the planning application met with no objection from Natural England. An ecology technical report is included in Appendix 4.
- WPI is working to resolve the outstanding matters arising from the determination of application 15/P/00012, as outlined by the Key Considerations provided in Appendix 1. None of the reasons for refusal question the suitability of the proposed allocation.

Introduction

This Representation has been submitted by Wisley Property Investments Ltd (WPI) as part of the consultation on the emerging Guildford Borough Local Plan: Strategy and Sites (Proposed Submission Version, June 2016) (GBLP). The Representation highlights, and where necessary expands, upon representations submitted by WPI at the Issues and Options stage of the Local Plan process in November 2013 and the subsequent Strategy and Sites consultation in September 2014.

The Wisley Airfield site was originally promoted to allow for the determination of a planning application concurrent with the Local Plan process. The application, ref 15/P/00012, was submitted in late 2014 to support the emerging Local Plan, the production of which was subsequently delayed. The application was determined in April 2016. None of the reasons for refusal are insurmountable. The Key Considerations are outlined in Appendix 1.

WPI is working to resolve the outstanding matters arising from the determination of application 15/P/00012, as outlined by the Key Considerations provided in Appendix 1. None of the reasons for refusal question the suitability of the proposed allocation.

WPI is in broad support of the GBLP. In summary, WPI has the following principal technical concerns with the GBLP:

- Clarity should be provided in respect of the proposed housing policy (draft policy S2) to ensure that the full housing requirement is outlined in the policy, in addition to a credible phasing of the housing allocations to enable a rolling five-year supply of housing. To enable the objectively assessed needs (OAN), the housing policy must be based on the delivery of ‘at least’ 13,860 dwellings (see Paragraph 3.10 onwards).
• The draft allocation of the Wisley new settlement should be effective and implementable. The proposed SNCI designation over the whole of WPI controlled land is unjustified, and an amendment is suggested (see Appendix 4). It should also be made clear that it is not the purpose of a Local Plan to make waste allocations, and thus the present waste notation is merely reflective of what the present 2008 Surrey Waste Plan includes (see Appendix 6). Further technical concerns are outlined, notably with respect to the convenience retail provision outlined by the emerging policy.

• The delivery of affordable housing should be expressed as a ‘target’. The provision of land at nil land value is un-evidenced and unlikely to be effective (see Paragraph 3.29 onwards).

• The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations (see Paragraph 3.73 onwards).

• The Sustainability Appraisal (SA) is broadly considered to be robust and soundly prepared. It demonstrates the need for all of the major strategic site allocations (as per Option 4). The SA should be enhanced, to include an accurate description of the Wisley new settlement to be consistent with the Housing Delivery Topic Paper. In addition, a further SA Option which includes the Wisley new settlement as OAN plus 6% buffer (an ‘Option 2A’) should be tested. This would provide additional support to the Local Plan (see Paragraph 2.3 onwards).

Wisley Airfield: A Sustainable New Settlement within Guildford Borough

Wisley Airfield contains the largest previously developed site in the Guildford Borough Green Belt. It is an exceptional opportunity for the Borough. Using the principle of sound planning, and a contemporary approach to architecture and landscaping, the community created would not only contribute significantly to the pressing local housing needs, but also create a settlement of distinct character, with facilities and amenities to benefit the wider villages in the area. The infrastructure delivered with the proposal would also provide potential county-wide benefit, for example the open spaces created to mitigate the Ockham Common Special Protection Area (SPA) and in respect of infrastructure enhancements to the A3 corridor to London.

This Representation provides further technical evidence to update that which accompanied the representations of November 2013 and September 2014. The evidence provided in respect of the Guildford Settlement Hierarchy (May 2014) demonstrates that a new settlement at Wisley Airfield has the potential to be a Rural Service Centre, fourth in the settlement hierarchy, aligned to East Horsley and behind only the major established settlements of Guildford town and Ash/Tongham (see Appendix 8). GBC through the draft allocation has recognised that the site is far from isolated, and is well connected to other settlements in the locality.

Draft Policy A35 outlines a requirement for the provision of a local centre, employment floorspace, a new primary/secondary school, community and health centres, shops and open spaces. These aspects are supported by WPI, and form part of our site promotion as outlined by the Concept Masterplan (Appendix 2). The provision of these facilities and services will contribute to the delivery of a sustainable development and increase the ‘self containment’ of the new settlement.

Updated evidence is also provided on transport (Appendix 3) which demonstrates a potential highways mitigation package, and substantial public transport provision/enhancements to enable the delivery of a new settlement at Wisley and to support sustainable transport at a number of existing villages. This is based on the emerging Infrastructure Delivery Plan (IDP), Appendix C (Infrastructure Schedule) and the Surrey Strategic Highways Assessment (2016). The site is very well related to Effingham Junction Station and is within five miles of nine railway stations in total, with direct access onto the strategic road network (which benefits from consented improvements). In addition, the development would provide improvements and extensions to existing bus routes, potentially delivering a 7-10 minute target frequency on some services, with funding to encourage the use of buses, for example by offering enhanced levels of frequency (this is based on in-perpetuity funding as set out in Appendix 11). This would greatly improve sustainable transport access both to the development and to the local villages. Critically, by virtue of its location on the London side of Guildford town, the site would have reduced impacts on the constrained A3 corridor through Guildford town when compared with selected other proposed allocations.

Further comment is made on the detail of the GBLP in respect of a need for the plan to positively recognise those key strategic items of infrastructure (as ‘projects’) which need to be delivered to enable the whole plan (to 2031).
Improvements to the A3 corridor will be best undertaken via a collaborative approach involving GBC, SCC and the Highways Agency. Minor alterations to the GBLP Appendix C (Infrastructure Schedule) are therefore suggested. Commentary is also made with regard to the GBC Topic Paper ‘Infrastructure and Delivery’.

In landscape terms, the site is well contained, as recognised in the independent Green Belt and Countryside Study (GBCS) undertaken by Pegasus (April 2014 update) on behalf of GBC. As outlined in WPI’s previous representations, detailed visual impact assessment work has been undertaken to inform the Concept Masterplan (Appendix 2). An update to the Green Belt assessment work is provided in Appendix 8. In the broader sense, the site is located relatively far from the nearest settlements, it is not within an AONB, and is well screened in landscape terms. The findings of the GBCS are supported in principle. WPI remains of the opinion that Wisley Airfield is one of the proposed allocations in the GBLP that contributes to the fewest of the purposes of the Green Belt. It is low to medium sensitivity, as outlined on Table 1.1.

In respect of Ecology, the proposals result in a substantial quantitative increase in habitats, supporting ecological objectives. In addition, the previous planning application received no objection from Natural England (see Appendix 4). WPI objects to the unjustified allocation of the whole of Wisley Airfield as an SNCI. Alternative evidence of a more robust SNCI area is provided in Appendix 4. This should also be judged in the context of the quantitative/qualitative improvements to the ecological baseline proposed, which may be brought forward in accordance with draft Policy I4 (Green & Blue Infrastructure).

The Concept Masterplan contained in Appendix 2 has been created following over three years of work, as informed by ongoing engagement with key consultees, stakeholders and the public. WPI held a series of public engagement events in May 2014, including Project Engagement Panels and has undertaken regular public liaison and surveys since (the history of the consultation is summarised by Appendix 10). The Masterplan outlines the sustainable mix of uses proposed, and extensive open spaces (over half of the site area). Crucially, the design vision is centred on the creation of a unique identity for the new settlement at Wisley, exploiting the opportunity to transform redundant, previously developed land into much needed housing in a unique landscaped setting. All of the community uses are proposed on WPI controlled land, which forms the vast majority of the proposed allocation (circa 115 ha of circa 132 ha).

The development of the Wisley Airfield site creates the opportunity to enable a county-wide recreation area comprising walks and ecological features. The Suitable Alternative Natural Greenspaces (SANGs) are a major opportunity arising from the development, reducing recreation pressure on the adjacent Ockham Common SPA.

Overall, the development would provide much needed affordable homes to meet local needs. The site could provide an outlet for a mixture of all tenures to suit identified needs, such as starter homes (if appropriate), private rented, intermediate and social tenures (up to 800 dwellings). The site would also accommodate some of the Gypsy & Traveller requirement for the Borough; in total up to eight pitches are proposed to conform to emerging policy A35.

Difficult decisions need to be made through the production of a Local Plan, notably in a Borough which is presently 89% Green Belt. Given the irregularity of Green Belt Reviews (the NPPF defines that Green Belt boundaries only be altered in exceptional circumstances, looking beyond the plan period), WPI believes that in broad terms the correct balance has been struck in the GBLP, which results in what is thought to be only circa 1.7% of the Green Belt being released. Through the allocation of justified additional Green Belt at Ash and Tongham, the Borough has achieved a solution which ensures that land which contributes the most to the purposes of the Green Belt is retained and wherever possible brownfield sites such as Wisley Airfield have been allocated for development.

The delivery of a new settlement at Wisley Airfield shall also assist with the protection, where justified, of the Green Belt elsewhere, for example some existing villages.

There are considerable housing needs in Guildford, as outlined in the West Surrey Strategic Housing Market Assessment (SHMA) – which covers Guildford, Waverley and Woking Boroughs. The SHMA evidence indicates that affordability pressures in the West Surrey Housing Market Area (HMA) are significant. House prices are substantially above the South East average. Entry level house prices in Guildford are 10.92 times the typical earnings of younger households, compared to a ratio of 6.45 nationally and demonstrates Guildford Borough as one of the least affordable in the country as shown in Figure 1.2 (Topic Paper: Housing type, tenure and mix).
The updated SHMA is dated September 2015. WPI supports the production of this joint SHMA, which is necessary to assess housing need across the whole housing market area, an approach which is consistent with the National Planning Policy Framework (NPPF). The SHMA outlines an OAN in the order of 693 dwellings per annum (dpa), which equates to the need for ‘at least’ 13,860 dwellings in the period 2013-2033 (693 x 20 years).

As GBC is aware, the existing developable and deliverable land within the urban areas is constrained. Given this, the allocation of Wisley Airfield is justified on the basis of meeting housing needs as part of the overall package of allocations, which total circa 12,400 dwellings over the plan period. A reasonable contingency over and above the OAN is included in the GBLP, once existing commitments, completions and an assumed windfall is taken into account, though the evidence included in the Land Availability Assessment (LAA) should be more clearly outlined in the GBLP, including a housing trajectory. This forms a technical objection as outlined in this Representation from paragraph 3.10.

The Wisley Airfield site is clearly the most deliverable strategic site within the Borough on the basis of the evidence and work undertaken to date, which includes the submission of the required details to support an outline planning application. In respect of enabling the early delivery of the housing trajectory, it should be noted that Wisley Airfield is progressing ahead of both Blackwell Farm and Gosden Hill. WPI makes no objection to either site, but notes the relative highways challenges associated with their delivery, as sites closer to the congested part of Guildford town, and the location of Blackwell Farm adjacent to the AONB. In addition, the proposal in respect of land at Normandy and Flexford is, in relative terms, less sustainable than the proposal for Wisley Airfield, as it proposes fewer dwellings. Neither of these sites is known to have progressed through even the early stages of planning, and hence in delivery terms both sit behind Wisley Airfield which is better placed to meaningfully contribute to the Five Year Housing Land Supply.

In respect of meeting identified affordable housing needs, the Wisley new settlement may account for up to 25% of annual need within the Borough (during the implementation period, 2018-2030), or circa 14% of total needs over the plan period. It is a significant allocation, ready and assembled for delivery.

Savills, acting as planning consultant, continues to engage in positive dialogue with GBC and SCC and wider stakeholders so that this opportunity may be realised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715 Local Plan Reps - July 2016 and Appendices.pdf (11.0 MB)

Comment ID: PSLPS16/7955  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Allocations – Policy A35 (including Former Wisley Airfield Map (Appendix G))

Object (not effective, justified nor positively prepared in respect of NPPF paragraph 182)

WPI only wishes to comment on one draft site allocation, A35. WPI makes no objection or comment on any other proposed site allocation.
Site Allocation draft policy A35 is strongly supported by WPI. The draft allocation is an obvious location for growth, well connected to highways and public transport (railway stations) to enable the delivery of a rolling five-year supply of land. A large proportion of the site is previously developed, circa 77 acres of the WPI controlled land. The Proposals Map allocation is also strongly supported.

The draft allocation comprises 114.7 ha of land in WPI control, and an additional circa 16.9ha of land allocated to the south, which is within Bridge End Farm. WPI understands that this land is available for development, and is being promoted separately. The constituent parts of the draft allocation to enable the delivery of the new settlement are entirely within WPI land control. The additional land at Bridge End Farm provides additional Green Infrastructure and residential land, not required to deliver the new settlement, but nonetheless proposed as part of the allocation to assist with overall Borough-wide housing delivery. This also reflects the Green Belt & Countryside Study (2014), which assessed the Airfield and Bridge End Farm together, Parcel C18-A, and provides the evidence base for the release of the land from the Green Belt.

Appendix 1 outlines a summary of Key Considerations relevant to the application 15/P/00012 and the delivery of a new settlement at the Wisley Airfield site. This also relates to paragraphs 4.110 to 4.116 of the Housing Topic Paper (June 2016). The Key Considerations support these representations, and introduce a series of Technical Reports.

The delivery of the new settlement would achieve many of the objectives outlined by Appendix C Infrastructure Schedule and the Surrey Infrastructure Study (2016), as outlined in Table 3.3.

The allocation of the Wisley new settlement has been achieved through the iterative development of a bespoke package of impact avoidance measures, including Suitable Alternative Natural Greenspace (SANG) provision and Strategic Access Management and Monitoring (SAMM), to ensure that any contributions towards likely significant effects on the Thames Basin Heaths SPA are avoided, in line with Proposed Policy P5 (discussed further below) and Policy NRM6 of the South East Plan.

The proposed package of impact avoidance measures has been agreed with Natural England, who has confirmed that subject to their delivery, it is satisfied that contributions towards a likely significant effect can be avoided. Accordingly, Natural England raises ‘no objection’ to the proposed development which is the subject of planning application 15/P/00012 brought forward in anticipation of the need to deliver this allocation, as detailed in Appendix 4.

WPI, whilst supportive of draft Allocation A35, does however wish to make some technical points of objection.

**Approximate Delivery:** The allocation refers to ‘approximately’ 2,000 dwellings. The GBLP should include a definition of what this means to be effective. For example, +/- 10% is typically considered appropriate to allow sufficient flexibility (for example the Horsham Planning Framework). WPI agrees that flexibility on this point is worthwhile and justified. In addition, the policy effectively allocates 2,100 dwellings, 100 of which are sheltered/extra care use. In WPI’s opinion, this use should be C2, as this would not trigger the requirement for SANGs for those units (as a C2 use may be suitably controlled with pet restrictions). The GBLP should be clear on this point as it presently outlines the use as ‘C3’.

**Cycling Enhancements:** WPI objects to the Infrastructure Schedule (Appendix C) provision ‘AM3’ with respect to off-site cycle enhancements. Many of these are not deliverable, and do not form part of the sustainable transport strategy, which is based on bus transport. Appendix 3 includes a technical transport update. As part of our ongoing liaison, WPI has had further discussions with Surrey County Council Highways regarding off-site cycle improvements. This is in the context that the sustainable transport measures for the delivery of the Wisley new settlement will be focused predominately on enhanced bus provision.

Draft allocation A35 outlines that off-site network enhancements are required to Effingham Junction, Horsley and Ripley. Off-site cycle enhancements may be provided where deliverable (i.e. within highways controlled land). WPI considers that the measure of the requirement based on the ‘average cyclist’ is ambiguous. The requirement should be deleted. Other routes are still being investigated, but most other off-site improvements would require the lead of SCC through the Highways Act 1980 and other legislation. It would be appropriate for the Local Plan to recognise this.

**Secondary Education Need:** The need for a secondary school on the site has been identified now, as indicated by the available infrastructure evidence (see Table 3.3). In addition, WPI has provided Appendix 5, which outlines clearly the needs generated by the new settlement, which mitigate the impacts and provide wider benefits. Policy A35 states that,
"Secondary educational need will be re-assessed at the time a planning application is made, at which time any recent new secondary school provision will be taken into account".

**Retail**: Based on the updated retail evidence, see Appendix 7, there is clearly sufficient justification for additional convenience retail on the basis of likely spend of the new residents of the Wisley new settlement / retail business turnover to justify a greater scale of convenience retail. This could be in the order of 1,500 sq m total, to sustain an ‘anchor store’. On the basis of the emerging masterplan (see Concept Plan, Appendix 2), the village centre may accommodate total A1-A5 provision of circa 2,240 sq m. On the basis of the evidence submitted (retail and land capacity) the present restriction of 500 sq m of convenience is unjustified and unlikely to be sound. Therefore WPI considers that the total convenience retail should be increased by 600 sq m, to 1,200 sq m. This would create a centre more likely to meet the needs of the new residents and thus would also have sustainability benefits.

**Design to Site Boundaries**: The policy principle should have regard to the overall draft design policy D1 (Making Better Places), noting WPI’s comments on this draft policy with respect to the opportunity created by a new settlement.

**Access/ Egress**: The site benefits from consented and implemented site access. The proposed measures to enhance Ockham Interchange and provide primary site access from this location are included in the Transport Technical Note (Appendix 3). There is no need for this provision in the policy, as any constraint has been resolved. It is noted that the Strategic Flood Risk Assessment (SFRA) acts as relevant evidence to support the GBLP. WPI notes that the existing Ockham Interchange roundabout is partly in Flood Zone 3. It is possible to construct the site access into the Wisley new settlement outside of the area at risk on the basis of engineering/design. There is no history of flooding on the roundabout. In addition, with respect to the application reference 15/P/00012 the Environment Agency had no objection.

**Traveller Pitches**: WPI is concerned that the GBLP is overly prescriptive with regard to the tenure of the traveller pitches. It may well be the case that these are privately or publically managed. These matters of detail should be left to the planning application stage. Similar to WPI’s representations on affordable housing, WPI also raises objection with respect to nil cost land transfer, and what this effectively means. In addition, it is not clear why the GBLP has to be prescriptive on the phasing of traveller pitches against the delivery of new dwellings, when the Plan is silent on delivery triggers for all other infrastructure provision. In order to best reflect the needs, on a 500-unit basis, an approximately 2,000 dwelling scheme may deliver a different quantum of traveller pitches. Therefore, the draft policy need only refer to ‘up to’ 8 pitches.

As a general comment, it is surprising that the GBLP only outlines one ‘opportunity’ associated with the delivery of the Wisley new settlement. This is listed as to “reduce flood risk elsewhere”. As GBC is aware, there are numerous economic environmental and social benefits arising from the new settlement. It is apparent that a number of other strategic site policies do not include any provisions under ‘opportunity’. To aid the clarity of the Plan, WPI considers that the provision should be deleted.

**Proposals Map/ Wisley Airfield Allocations**

Associated with draft Allocation A35 is the overall Proposals Map and Wisley Airfield Map.

The proposal to include the Wisley Airfield land as a Site of Nature Conservation Importance (SNCI) is unjustified and unevidenced. Appendix 4 includes an alternative boundary, based on ecological evidence and a robust matrix in accordance with applicable guidance.

Appendix 6 includes an update with respect to the extant planning permission for an In-Vessel Composting Facility (IVC) and the Surrey Waste Plan allocation for a waste use on part of the site (circa 17ha western element). WPI’s position is that the GBLP must be amended with respect to the Waste Allocation to make clear that this simply is reflective of the present Surrey Waste Plan. The GBLP is not a Waste Plan, and GBC is not the Minerals & Waste Authority, and thus it cannot and should not be anything else. No new or updated proposals for waste can be proposed through the GBLP. In addition, WPI considers the GBLP to be inconsistent, as it does not appear to illustrate all Surrey Waste Plan allocations on its Proposals Map.

In summary, based on all of the available evidence and national planning policy, the best use of the land is now for a new settlement.

**Phasing**
WPI outlined a position in respect of the intended phasing of development in the planning application (15/P/00012). The phasing of the dwellings would be completed in accordance with the landscape design of Neighbourhoods, and as such the new settlement has been divided into four ‘Neighbourhood Blocks’. A Concept Land Use Masterplan is provided in Appendix 2.

Based upon an outline planning consent being granted in early/mid 2017, and the first Reserved Matters Submission being made in late 2017, it is envisaged that the first phase of development could commence in 2019/2020. The phasing of development broadly assumes a housing build rate of no more than 50 dwellings per year, per outlet. Between 2019/20 and 2030/31 the four Neighbourhood Blocks can deliver 2,068 dwellings at an average of 172 dwellings per annum. Table 3.4 outlines.

Table 3.4 is based on the Concept Masterplan, which envisages four master phases, broadly based on four Neighbourhood Blocks of development, which sit within the three proposed neighbourhood character areas.

The delivery of the employment area and local centre including the primary school will be phased in detail through a detailed submission phasing plan. This will also include the phasing of the proposed traveller pitches. It is suggested that this can be addressed via suitable planning condition. This will need to have regard to wider constraints and obligations, including the phasing of SANGs.

An initial phase of SANGs will likely be progressed through planning in 2017 to enable implementation in 2017/18, and hence residential occupations by March 2020.

There will be a degree of overlap between each phasing period.

Illustrative timing of the delivery of economic and social/ community infrastructure is as follows:

- Temporary retail facilities â€“ 2020/21
- Primary School/ Nursery Provision – from period 2019/20 (or by 500th occupation)
- Local Centre/ Village Centre – 2022/23
- Employment (Phase 1) â€“ 2024/25
- Secondary School – 2023/24 (by 750th occupation, on-site provision or contribution)
- Travellers Provision - 2024/25
- Sports Facilities â€“ 2025/26
- Employment (Phase 2) – 2028/29
- 2nd Nursery – 2028/29

Illustrative timing of the SANGs is as follows:

- Release of Phase 1 SANG (38.7 ha) – 2018/19
- Release of Phase 2 SANG (2.1 ha) – 2026/27
- Release of Phase 3 SANG (8.4 ha) â€“ 2027/28
- Release of Phase 4 SANG (0.7 ha) – 2028/29

A SANGs car park will be operational for the first development occupation (2018/19) accessed from the main site access from Ockham Interchange. This will be via the construction of the first section of ‘Ridgeway Avenue’ main development spine road, to an acceptable standard to allow for initial access/use. The SANGs strategy is agreed with Natural England.

Changes Sought

The following amendments to draft Allocation A35 are suggested.

Amend the requirement for approximately 100 sheltered/ Extra Care homes to be C2 or C3 use.

Amend the convenience retail provision to read 1,200 sq m.

Amend the paragraph with respect to off-site cycle network enhancements, as follows:
"Preserve and enhance the existing off site cycle network from the Land at former Wisley airfield site to key destinations, including cost-effective improvements to a level that would be attractive and safe."

The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be determined.

Amend the bullet point with respect to "sensitive design" as follows:

"The delivery of a new settlement provides an opportunity for distinctive character and unique and quality design. A balance should be achieved to enable a design that meets these principles and is designed with the landscape."

Delete the bullet point with respect to site access/egress.

Delete the requirement for an application level ‘Habitat Regulation Assessment’. This is the role of the Borough Council as the competent authority.

Delete the bullet points which refer to the tenure requirements for the traveller pitches and reference to nil cost. Delete the bullet point with respect to the phasing of the delivery of traveller provision. Include reference to ‘up to’ 8 traveller pitches.

For consistency delete the bullet point related to ‘opportunity’ as it is not apparent what this means, and no other major strategic site has this bullet point.

For clarity draft Allocation A35 should amended to read (Changes in Red):

In addition, the GBLP should include a Glossary, which defines 'approximately' as ‘+/- 10%’.

The overall phasing of the Wisley new settlement should reflect the phasing provided in these representations. This should be within the housing trajectory of the GBLP and associated evidence base.

In respect of the Proposals Map:

- Amend SNCI area. See Appendix 4.
- Adopt a consistent approach towards safeguarded waste sites.
- Refer to the Surrey Waste Plan factually as an outgoing Plan, highlighting that waste allocations and safeguarded sites are likely to change in the Revised Surrey Waste Plan.
- Either remove safeguarded waste sites from the Policies Map or amend the notation on the Map to be factually correct, ‘Surrey Waste Plan 2008 Waste Notation’.

Conclusion

WPI has made a number of representations on the GBLP. This is supported by a range of technical evidence which complements the Key Considerations applicable, notably to support the draft allocation, and respond to the reasons for refusal of the recent planning application (reference 15/P/00012). WPI is in broad support of the GBLP, the planned housing requirement, infrastructure provisions and draft allocation of a new settlement at Wisley Airfield. WPI does however have some technical objections.

In summary WPI has the following principal technical concerns with the GBLP:

- Clarity should be provided in respect of the proposed housing policy (draft policy S2) to ensure that the full housing requirement is outlined in the policy, in addition to a credible phasing of the housing allocations to enable a rolling five-year supply of housing. To enable the objectively assessed needs (OAN), the housing policy must be based on the delivery of 'at least' 13,860 dwellings (see Paragraph 3.10 onwards).
- The draft allocation of the Wisley new settlement should be effective and implementable. The proposed SNCI designation over the whole of WPI controlled land is unjustified, and an amendment is suggested (see Appendix
4). It should also be made clear that it is not the purpose of a Local Plan to make waste allocations, and thus the present waste notation is merely reflective of what the present 2008 Surrey Waste Plan includes (see Appendix 6). Further technical concerns are outlined, notably with respect to the convenience retail provision outlined by the emerging policy.

- The delivery of affordable housing should be expressed as a ‘target’. The provision of land at nil land value is un-evidenced and unlikely to be effective (see Paragraph 3.29 onwards).
- The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations (see Paragraph 3.73 onwards).
- The Sustainability Appraisal (SA) is broadly considered to be robust and soundly prepared. It demonstrates the need for all of the major strategic site allocations (as per Option 4). The SA should be enhanced, to include an accurate description of the Wisley new settlement to be consistent with the Housing Delivery Topic Paper. In addition, a further SA Option which includes the Wisley new settlement as OAN plus 6% buffer (an ‘Option 2A’) should be tested. This would provide additional support to the Local Plan (see Paragraph 2.3 onwards).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715 Local Plan Reps - July 2016_and Appendices.pdf (11.5 MB)

Comment ID: PSLPP16/18562  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent:  Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1: Making Better Places

Object (not effective in respect of NPPF paragraph 182)

WPI supports the majority of the meaning and intention of the design policy. The design principles outlined are sound and reflect better practice.

A technical objection is raised with respect to the bullet points on residential developments of 25 or more dwellings. This reflects comments made by WPI on draft policy H1 (Homes for All). It is typical for new residential developments to have regard to character and context considerations. However, the opportunity to embrace distinctive new character and density should be reflected in the policy. WPI has made a similar representation with respect to draft policy D1 (Making Better Places).

The same principle applies to the use of art and materials "of a nature, appropriate to their setting". Major new developments have the potential to create place and setting.

In order to be effective, amendments are required to this draft policy. This would best be achieved by simply recognising the potential design benefits offered by major strategic development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy D2: Sustainable Design

Object (not justified, effective nor consistent with national planning policy in respect of NPPF paragraph 182)

WPI considers that Policy D2 is unjustified and contrary to national planning policy on the basis that it is largely repetitive of matters which should be covered by the Building Regulations (Part L). The policy requirement for all developments to be zero carbon, based on regulated energy use, would place the Borough as out of step with many Districts.

The Government’s Ministerial Statement of 25 March 2015 set out that that from the date the Deregulation Bill is given royal assent (26 March 2015), Local Plans should not include any additional (to the new “optional building regulations” and the new national space standards) local technical standards or requirements relating to the construction, layout or performance of new dwellings. As set out within GBC’s own Sustainability Topic Paper:

"Written ministerial statements are material planning considerations. The Deregulation Bill has now been given royal assent so Local Plans should not set technical standards for construction, layout or performance of dwellings except the optional building regulations, the planning space standard and energy performance requirements up to the equivalent of Code for Sustainable Homes Level 4, without a compelling reason to do so.”

The whole purpose of the Standards Review was to impose consistency across the country, to assist with the delivery of development and thus matters such as water and energy efficiency are addressed by the Building Regulations. Paragraph 95 of the NPPF states that when setting local requirements for a building's sustainability, local planning authorities must do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards. Following the royal assent of the Housing and Planning Bill the Government’s proposed Zero Carbon Standard has been deleted and in its stead, the Government has introduced a clause to the Bill which commits to a review of the energy efficiency standard for new homes in building regulations. There is no time scale nor is there any specific criteria for the review.

As set out within the Planning Practice Guidance (PPG), local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water. However, in doing so the local planning authority will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans (Reference ID: 56-002-20160519). It is not clear where the evidence behind the requirements of Policy D2 is located within the Local Plan evidence base.

The requirement for all developments to connect or make provision for Combined Heat and Power (CHP) is unjustified, and un-evidenced. There are some locations where CHP can be made both viable and feasible, however, these are typically
higher density developments, in urban locations. There are limited, if any, examples nationally of major and large scale developments of lower densities (below 50 dph) enabling CHP. NPPF paragraph 173 states that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking.

WPI understands that Policy D2 is intended to align with national legislation, policy and guidance by offering strong support for low and zero carbon and decentralised energy with a particular focus on Combined Heat and Power (CHP). However, WPI suggests that the wording of Policy D2 be amended to make clear the policy is ‘encouraging’ rather than requiring measures to be met.

Finally, the policy is ineffective, as it makes no reference to viability or feasibility factors, in requiring the implementation of zero carbon. There are no references to any ‘allowable solutions’, which are off-site sources of energy generation, which may count towards carbon offset.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2: Location of New Employment Floorspace

Object (not effective in respect of NPPF paragraph 182)

WPI is concerned that draft policy E2 may be in conflict with the proposed strategic allocations, including the Wisley new settlement, which make provision for B Class employment, on-site. Clearly, for proportional employment in excess of 200 sq m, new strategic allocations are sequentially preferable sites. The draft policy should be amended to ensure that it is effective and consistent with the overall GBLP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

Comment ID: PSLPP16/18558  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)
Policy E7: Guildford Town Centre

Support (Sound)

WPI largely supports the wording of Policy E7 and fully endorses GBC’s approach to enhancing the Town Centre. The regeneration of Guildford Town Centre will re-affirm its important regional role and help to secure the long term economic, environmental and cultural viability of the whole town centre. In addition, the redevelopment of Brownfield sites within the Town Centre will help GBC and other landowners to deliver new homes and offices in sustainable locations, ensuring that Guildford continues to remain an attractive place to live and work.

The suggested delivery of 242 dwellings within the first five years of the Local Plan (post-adoption) is noted but challenging. Town Centre development is inherently complex, notably given the densities and scope for additional mixed uses/land assembly (see Table 3.2, which demonstrates the bulk of development is coming forward beyond the five year period). By way of example, the refusal of a planning application for a mixed use redevelopment at Guildford Railway Station (reference 14/P/02168) comprising 478 new dwellings on 29 June 2016 is illustrative of the difficulties associated with town centre regeneration projects.

In addition, development height will always be governed by Guildford’s undulating topography and historic considerations, thus a longer time horizon may be required. Even should this level of growth be achieved then this would represent only 20% of planned town centre growth.

Given the complexities associated with Town Centre Development, there is a need for a flexible suite of development allocations, including the significant contribution large scale Brownfield/Greenfield sites may bring. The Guildford Annual Monitoring Report 2014/15 (October 2015) shows that there is currently 2.4 years’ housing land supply within the Borough when calculated against the OAN figure of 693 dpa (West Surrey SHMA, September 2015). This figure has been confirmed at a recent Appeal in Ash in which 56 dwellings were allowed by the Inspector (APP/Y3615/W/3135326). The Wisley new settlement can deliver a significant number of dwellings within the first five years of the plan period and it is actively programmed to deliver new homes ahead of other strategic sites in the GBLP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps_July_2016_and_Appendices.pdf (11.0 MB)
Policies E8/ E9: District & Local Centres

Object (not justified in respect of NPPF paragraph 182)

The Local Plan is unjustified on the basis of the proposed restriction on food takeaways (A5 uses) within 500m of schools. This is unsupported by appropriate evidence and not a reasonable material planning consideration. There does not appear to be any evidence base to support this, and no explanation is included within the reasoned justification. The same policy provision is also included within Policy E7 with respect to Guildford Town Centre, again without justification.

To place the policy into a practical context, at the Wisley new settlement, the Concept Masterplan (Appendix 2) includes a local centre (which may include A5 uses) adjacent to the proposed primary and secondary school site. There are design, transport and sustainability reasons to support this co-location. As read, this proposal would be in conflict with emerging policies E8 and E9. Indeed, it is best practice to provide critical mass at local centres to not only create a sustainable place but also to make the proposals viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

Comment ID: PSLPP16/18560  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies E8/ E9: District & Local Centres

Object (not justified in respect of NPPF paragraph 182)

The Local Plan is unjustified on the basis of the proposed restriction on food takeaways (A5 uses) within 500m of schools. This is unsupported by appropriate evidence and not a reasonable material planning consideration. There does not appear to be any evidence base to support this, and no explanation is included within the reasoned justification. The same policy provision is also included within Policy E7 with respect to Guildford Town Centre, again without justification.

To place the policy into a practical context, at the Wisley new settlement, the Concept Masterplan (Appendix 2) includes a local centre (which may include A5 uses) adjacent to the proposed primary and secondary school site. There are design, transport and sustainability reasons to support this co-location. As read, this proposal would be in conflict with emerging policies E8 and E9. Indeed, it is best practice to provide critical mass at local centres to not only create a sustainable place but also to make the proposals viable.

As a separate point, WPI supports the proposed designation of a local centre at the Wisley new settlement, as outlined in paragraph 4.4.92.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Policy H1: Homes for All

Object (not effective in respect of NPPF paragraph 182)

WPI supports the flexible approach proposed by Policy H1. The housing needs of the SHMA, as outlined in emerging paragraph 4.2.3, are noted.

A technical objection is raised with respect to the paragraph on density. It is typical for new residential densities to have regard to character and context considerations. However, the opportunity to embrace distinctive new character and density should be reflected in the policy. WPI has made a similar representation with respect to draft policy D1 (Making Better Places).

In addition, the provision regarding specialist housing (by which we assume the plan is referring to tenures such as self build or elderly accommodation) is ineffective, as the policy provides no clarity nor certainty over what is proposed, when or where. It merely refers to supporting specialist housing in ‘sustainable locations’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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### Policy H2

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy H2: Affordable Homes

Object (not justified nor positively prepared in respect of NPPF paragraph 182)

In order for the policy to be effective, it would need to be achievable. WPI has concerns that the draft policy is not sufficiently flexible or based on an understanding of the available evidence base. The draft policy fails to have regard to NPPF paragraph 182.

The NPPF is clear on the need for ‘competitive returns’ to enable a willing landowner and developer to proceed with development. Value is clearly linked to the planning system, and hence the level of affordable housing is clearly a relevant factor. Viability is recognised in the GBLP in draft paragraphs 4.2.38 to 4.2.41. The viability clause should however be included in the policy.

The Guildford Local Plan Viability and Affordable Housing Study (2014) was produced by PBA, and has been used to support a 40% provision, on sites of 5 or more units, such as Wisley Airfield. WPI does not wish to scrutinise this evidence in any great detail. Various suggested amendments to the approach proposed were made by WPI with respect to representations on the emerging Community Infrastructure Levy (CIL) Charing Schedule, in 2014.

WPI does however wish to note that, to be effective, draft policy H2 should require a ‘target’, consistent with overarching affordable housing policy. Numerous Inspectors’ decisions have supported the use of a target, rather than set level of provision.

The draft policy also specifically outlines a tenure requirement of 70% social rented. This is prescriptive and likely to be out of kilter with national planning policy. It cannot reflect, for example, the recent imposition of starter homes included in the Housing and Planning Act 2016.

Finally, the draft policy requires that land for affordable housing be provided at nil value, in other words, that the landowner and various market components of a development proposal further subsidise the provision of fee and serviced land, on a net developable basis. This is uneconomic and unlikely to meet the NPPF requirements. The Guildford Local Plan Viability and Affordable Housing Study (2014) is not based on an assumption of nil land value. Paragraph 5.3.10 outlines that a discounted transfer value was assumed in the appraisal, of 55% to 65% of open market value. This is assumed to be based on sales value. The methodology does not state that land was transferred at nil cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)
Changes Sought

In respect of affordable housing, the plan clearly includes a policy target. This should be reflected in the Vision. The following amendment is therefore suggested:

"Affordable housing will account for approximately 40% of all new housing and provided on all appropriate sites"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy II: Infrastructure and Delivery

Object (not positively prepared nor effective in respect of NPPF paragraph 182)

WPI supports entirely the provision of phased infrastructure required to mitigate the impacts of developments and enable the delivery of the Local Plan. The provision of new hard and soft and Green Infrastructure at the Wisley new settlement is central to the promotion and delivery of the proposed allocation.

The present draft policy wording is ineffective and unjustified, as it seeks infrastructure based solely on when it is first needed by occupants. This is overly narrow and rigid, and pays little attention to wider infrastructure delivery factors. A proportional approach should be included, which enables the phased delivery of infrastructure, commensurate to overall scheme delivery, the overall Infrastructure Delivery Plan (IDP) supporting the Local Plan, and with due regard to scheme viability, and hence delivery. The present wording which requires ‘timely’ infrastructure delivery, pays no attention to development viability, and hence the situation whereby the necessary infrastructure has to be phased alongside development delivery.

Infrastructure provision and delivery will ultimately be the responsibility of a number of organisations, developers and landowners as well as public authorities. Whilst Section 106 and CIL funding is important, subject to the relevant tests of the CIL Regulations (122/123), the Local Plan will only be delivered on the basis of wider funding streams. This is clearly outlined within the Surrey Infrastructure Study (2016) produced by SCC. This outlines:

- Total infrastructure costs for GBC estimated to be £1.16bn
- £75m is secured funding
- Expected funding is as much as £569m
- Which leaves a shortfall of £518m
- Deficits in primary and secondary education
- County wide requirement for further community facilities, doctors (an additional 11 GPs), outdoor sport and recreation and social care beds
- Most of the infrastructure cost is highway and rail, specific for Guildford Borough
- Specific to the Wisley new settlement, the Junction 10 (M25/A3) is costed at £175m, with funding. The proposed Guildford Strategic Corridor (A3) is listed at £300m.
WPI strongly supports the delivery of new infrastructure. In the representation in respect of the proposed allocation of the Wisley new settlement (draft allocation A35), WPI notes that the delivery of the new settlement will meet many of the priorities listed in the Surrey Infrastructure Study. Appendix 5 outlines the education needs for the Wisley new settlement, in support of the requirement for a primary and secondary school on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160715_Local_Plan_Reps__July_2016__and_Appendices.pdf](160715_Local_Plan_Reps__July_2016__and_Appendices.pdf) (11.0 MB)

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Policy ID2: Supporting the DfT’s RIS

Support (Sound)

WPI supports the draft policy and initiatives to enable Highways England deliver the Roads Investment Strategy 2 (RIS 2). The Local Plan delivery should be phased alongside the RIS 2. In respect of specific development proposals, whilst regard for RIS 2 is essential, due regard to infrastructure phasing proposals, in accordance with draft policy I1, is important (see WPI’s suggested amendments). It may be the case that development can proceed on the basis of short term or interim measures, ahead of Government investment decisions.

Transport technical evidence in support of the Wisley new settlement is included at Appendix 3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160715_Local_Plan_Reps__July_2016__and_Appendices.pdf](160715_Local_Plan_Reps__July_2016__and_Appendices.pdf) (11.0 MB)

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Policy ID3: "Other" submission

Support (Sound)

The Local Plan delivery should be phased alongside the RIS 2. In respect of specific development proposals, whilst regard for RIS 2 is essential, due regard to infrastructure phasing proposals, in accordance with draft policy I1, is important (see WPI’s suggested amendments). It may be the case that development can proceed on the basis of short term or interim measures, ahead of Government investment decisions.

Transport technical evidence in support of the Wisley new settlement is included at Appendix 3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160715_Local_Plan_Reps__July_2016__and_Appendices.pdf](160715_Local_Plan_Reps__July_2016__and_Appendices.pdf) (11.0 MB)
**Policy I3: Sustainable transport for new developments**

**Support (Sound)**

WPI supports the draft policy. As outlined, transport technical evidence in support of the Wisley new settlement is included at *Appendix 3*.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [160715_Local_Plan_Reps__July_2016__and_Appendices.pdf](#) (11.0 MB)

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**Comment ID:** PSLPP16/18567  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Charles Collins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**Policy I4: Green and Blue infrastructure**

**Object (not effective in respect of NPPF paragraph 182)**

We are strongly supportive of the principles and aims set out in draft Policy I4. However, we recommend some adjustments to the current wording of the draft policy and supporting text in order to ensure consistency with the NPPF.

The absolute requirement for new development to provide ‘net gains’ in biodiversity in all cases is not enshrined in the NPPF, which makes reference to delivering net gains in biodiversity ‘where possible’. Whilst we support the delivery of net gains in biodiversity where possible, and see this as a wholly positive aspiration, the Local Plan must nonetheless be consistent with national policy. The draft policy wording should therefore be amended to ensure consistency with the NPPF.

The draft policy wording states that “where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives.” Again, whilst it is good practice for proposals to seek to support the objectives of the BOA into which they fall, these areas are broad and strategic in nature, and in many instances it is likely that alternative biodiversity enhancements are more appropriate for particular sites and proposals. This statement should therefore be amended to enable greater flexibility for schemes to deliver the most appropriate biodiversity measures at a particular location; the addition of ‘where appropriate’ at the end of the above sentence would allow for this. This would also be consistent with GBC’s interpretation at paragraph 4.8, bullet point 1 of the ‘Green and Blue Infrastructure Topic Paper’.

The draft wording also states that “permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.” We broadly support this position, although in our view the policy should also make reference to the need to provide impact avoidance insofar as is possible in the first instance, and where unavoidable impacts are then likely, mitigation and/or compensation measures taken where necessary, in accordance with the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Policy P1: Surrey Hills AONB

Support (Sound)

WPI supports the ongoing protection for the Surrey Hills AONB. The allocation of new land for development outside of the AONB has ensured this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2: Green Belt

Support (Sound)

The overall amendments to the Green Belt boundaries, as shown by the Key Diagram, Proposals Map and proposed allocations, including Wisley Airfield are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps_July_2016_and_Appendices.pdf (11.0 MB)
Policy P5: Thames Basin Heaths SPA

Object (not justified nor effective in respect of NPPF paragraph 182)

WPI acknowledges and strongly supports the need to ensure that there is no likely significant effect on the Thames Basin Heaths SPA resulting from increases in recreational pressure due to the Local Plan acting either alone or in combination with other plans and projects. The extremely well advanced proposals for Suitable Alternative Natural Greenspace (SANG) provision at Wisley Airfield, and the overall package of bespoke impact avoidance and mitigation measures, as endorsed by Natural England, reflect this.

However, we maintain a technical objection with respect to the precise wording of draft Policy P5, as it unhelpfully elides the first two distinct stages in what is known as the ‘Habitats Regulations Assessment’ (HRA) process, carried out under the Conservation of Habitats and Species Regulations 2010 (as amended).

These first two stages of the HRA process, which should be addressed in sequence, are the Screening and Appropriate Assessment stages respectively. The detail of the process to be followed is included in Appendix 4 with respect to Ecology.

The first paragraph of Policy P5 confuses the Screening and Appropriate Assessment stages of the HRA process by eliding the notions of ‘likely significant effect’ (considered under Screening) and ‘adverse effect on integrity’ (considered under Appropriate Assessment).

Bullet points 2, 3, 5, 6 and 7 of the draft policy wording, and its supporting text, make reference to the provision of SANG and SAMM as ‘mitigation’ measures. However, in line with the strategic approach advocated within the Delivery Framework discussed above, such measures are actually intended to prevent any net increase in recreational pressure on the SPA altogether, rather than mitigate (reduce) potential effects, and therefore are better labelled as ‘impact avoidance’. All references to ‘mitigation measures’ in relation to this policy should therefore be removed and replaced by the term ‘impact avoidance measures’.

The last bullet point of draft Policy P5 is technically incorrect (or at least incomplete). Whilst bespoke impact avoidance measures should be agreed with Natural England under Policy NRM6 of the South East Plan, GBC is the competent authority for the purposes of the Habitats Regulations, and the decision maker. Hence, proposals for new SANGs cannot and should not be ‘approved’ by Natural England. Rather, Natural England is a key consultee. The reference to Natural England ‘approving’ SANGs should be deleted from the draft policy and paragraph 4.3.60. Instead, the important role of Natural England should be noted in their capacity as a key statutory consultee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy (Including Tables 1 and 2 & the Land Availability Assessment)

Object (not effective, positively prepared nor consistent with national policy in respect of NPPF paragraph 182)

The overall proposal to allocate land to meet the OAN is supported. The GBLP is clearly positively prepared in spirit.

WPI does however maintain a technical objection to draft policy S2, as in application there is a notable shortcoming with respect to accounting for the actual planned growth, development phasing and contingency. There are also inconsistencies throughout in respect of how the Land Availability Assessment (LAA) relates to the proposed policy, the Sustainability Appraisal (SA) and other supporting documents such as the topic papers.

Planned growth and contingency: As set out within Policy S2 the OAN over the plan period is 693 x 20 years = 13,860 homes (2013-2033). It is typically the case that adopted plans include a circa 10% contingency for non-implementation. This is to reflect unimplemented consents and the number and scale of proposed allocations, the vast majority of which are still to progress through planning. It is well known, for example, that the Slyfield Regeneration Area will deliver homes toward the end of the plan period. In addition, there are obvious complexities with some Town Centre sites, notably at the station, exemplified by the recent refusal of planning permission (ref. 14/P/02168).

Draft policy S2 only indicates that the plan "will make provision for 13,860 new homes". This is not a factual statement. It is also not positively prepared, as the plan includes additional provision and hence the emerging policy is ineffective. In addition, the draft policy makes absolutely no references to the sources of housing supply in the period 2013-2018. Instead it includes a phased annual housing target (range 500 dpa to 790 dpa) in the period 2018–2033. This is also ineffective, as the Plan Period is clearly 2013-2033.

There is no requirement or allowance in the NPPF to artificially set a five-year housing land supply period, some two years hence. The NPPF is clear that Local Authorities must maintain a rolling five-year housing land supply.

Phasing: Based upon an annual delivery rate of 693 dpa, draft Policy S2 indicates that housing delivery will not reach parity until 2028/29. In other words, there will be a planned under supply for the first 15 years of the 20-year plan period. WPI understands the rationale behind the phased or stepped approach to housing delivery as set out within the LAA and justified within the Housing Topic Paper. However, this approach requires that GBC make every effort to support the delivery of dwellings from the strategic sites as early as possible in the plan period.

The overall phasing of the Wisley new settlement should reflect the phasing provided in these representations (see comments on draft allocation A35). This should be within the housing trajectory of the GBLP and associated evidence base.

In respect of Table 1, it should be clarified whether the homes indicated in the second column include C2 uses, as well as C3. The allocation for the Wisley new settlement should be to deliver approximately 2,000 homes (C3 use) in addition to 100 homes for the elderly (C2 use).

The Guildford Annual Monitoring Report 2014/15 (October 2015) shows that there is currently 2.4 years' housing land supply within the Borough when calculated against the OAN figure of 693 dpa (West Surrey SHMA, September 2015). This figure has been confirmed in a recent planning appeal decision relating to development at Ash in respect of which planning permission for 56 dwellings was granted by the Inspector (APP/Y3615/W/3135326).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160715_Local_Plan_Reps__July_2016__and_Appendices.pdf](160715_Local_Plan_Reps__July_2016__and_Appendices.pdf) (11.0 MB)

Comment ID: SQLP16/1991  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): (*)*

**Commentary on the Evidence Base**

The evidence base supporting the GBLP is understood to comprise:

- Affordable Housing Viability Study (April, 2008)
- Conservation Character Area Appraisals
- Employment Land Needs Assessment (September, 2015)
- Guildford Local Plan Viability and Affordable Housing Study (2014)
- Habitat Regulations Assessment (June, 2016)
- Infrastructure Baseline (July, 2013)
- Infrastructure Delivery Plan (2016)
- Land Availability Assessment (2016)
- Options Growth Scenarios Transport Assessment Report (January, 2014)
- PPG17 Open Space Sport and Recreation Audit (February, 2006)
- Retail and Leisure Study (May, 2014)
- Settlement Hierarchy and Settlement Profiles (May, 2014)
- Strategic Flood Risk Assessment (2016)
- Strategic Highway Assessment Report (June 2016)
- Strategic Housing Land Availability Assessment (SHLAA) (May 2014 Update)
- Surface Water Management Plan (November, 2013)
- Sustainability Appraisal Report (May, 2016)
- Topic paper - Flood Risk
- Topic paper - Environmental Sustainability and Climate Change
- Topic paper - Green and Blue Infrastructure
- Topic Paper - Retail and Town Centre
- Topic paper - Tourism and Leisure
- Topic paper - Duty to Cooperate
- Topic paper - Employment
- Topic paper - Green Belt and Countryside
- Topic paper - Housing Type Tenure and Mix
The evidence which has been updated/published since the submission of WPI’s representation in September 2014 is indicated in bold and has been referred to in this Representation where appropriate.

**Sustainability Appraisal (SA)**

WPI strongly supports SA Option 4. This Option includes a mix of sites/allocation based on achieving Objectively Assessed Needs (OAN) plus a reasonable (and justified) buffer of 14%. A buffer over the OAN of 693 dwellings per annum (dpa) (13,860 over the plan period) is entirely justified, as outlined in WPI’s representations on draft policy S2 (Borough Wide Strategy). The SA therefore forms a robust basis to justify the Local Plan; it could and should however be enhanced to provide further justification.

It is not clear why the SA includes analysis of housing completions and commitments, as a planning decision has been made on these sites, and in the case of completions, the relevant development delivered, and hence part of the overall baseline. The SA has to be based on the plan period, and plan, hence the period 2013-2033. However, it also has to be grounded in the reality that the plan will be adopted in 2017, and hence the SA is principally an assessment of the proposed allocations, which will make up the vast majority, circa 90%, of the OAN (excluding any buffer).

Option 3 (OAN plus 12% buffer) includes Liddington Hall (600 dwellings). This site is not proposed for allocation within the GBLP. Whilst it is appreciated that the option to test Liddington Hall should be included (as part of the assessment of reasonable alternatives), it is the case that the Wisley new settlement can form a credible option for assessments below Option 4, i.e. within OAN plus 12% buffer or less. The Wisley new settlement could form a new Option to be tested alongside:

- GBGB – Ash & Tongham extensions 1,235 dwellings. It is not clear why 1,835 is included in Option 3, as this level of growth is otherwise only triggered with OAN plus 27% buffer (Option 6)
- Send Marsh allocations at 0 (as these are not proposed in the GBLP)
- Liddington Hall at 0 (as this site is not proposed in the GBLP)
- Normandy/ Flexford at 0 (as although this site is a proposed allocation, there is presently no option included which does not assume its none allocation – WPI questions the application of the ‘sequential approach’ in this regard – see paragraph 2.8 onward of this Representation)

With all other variables fixed (as per Option 4) this would equate to a further Option ‘2A’ of 14,744 dwellings (OAN plus 6% buffer).

WPI notes that the analysis of the SA on page 26 is not consistent with the Housing Topic Paper with respect to the Wisley new settlement. In addition, the SA could be enhanced through further option testing with respect to the proposed ‘sequential approach’

The first comment is in respect of the sequential approach. WPI agrees that Brownfield sites and sites within existing urban areas are sequentially preferable locations for growth (noting the capacity constraints in these locations). It is not necessarily the case that all Green Belt around Guildford town should be considered as sequentially preferable to a new settlement option, notably as the new settlement option at Wisley Airfield is partly previously developed land. It is also not clear why Norvandy and Flexford has not been included as an option, rather a ‘given’ in all 8 Options. The site is Green Belt, all Greenfield, and would deliver a reduced quantum of development, and hence ‘critical mass’ to the Wisley new settlement. Whilst WPI has no in-principle objection to the Normandy and Flexford allocation, the prospect of it as an option would aid the robustness of the SA.
WPI maintains a technical objection with respect to the wording of the SA regarding the Wisley new settlement (see page 26 of the GBLP). The following is the case, and would better reflect the GBLP inclusion of a new settlement allocation (as per the Housing Topic Paper):

- The only available and realistic location for a new settlement in Guildford Borough is at Wisley Airfield.
- The site contains the largest previously developed site in the Guildford Borough Green Belt (circa 77 acres).
- The site was progressed through a planning application (reference 15/P/00012) directly in support of the emerging Local Plan, to assist with the overall evidence base and demonstrate early delivery. This remains the case and, on the basis of the reasons for refusal, there are now a number of resolvable Key Considerations to enable the delivery of the proposal through planning (see Appendix 1).
- A Local Plan allocation may of course be justified based on the tests of the NPPF, which are not the same as the specific (and detailed) requirements for a planning application.
- There are no matters which call into question the suitability of the site for a new settlement.

WPI understands why the Wisley new settlement is identified as an option, however, it must be tested equally and fairly against other site options, based on the facts, and relative sustainability. In other words, the SA should test further combinations of options. Page 26 must be updated to reflect the available evidence presented in these representations.

WPI has outlined in Appendix 8 analysis of the draft allocations against the wider evidence base, notably the Green Belt & Countryside Study (2014). This objectively outlines the value of each major draft allocation against the defined purposes of the Green Belt (as given by the NPPF). WPI has undertaken this exercise to question the SA’s conclusions of Low, Medium and High sensitivity, against each draft allocation/development option, in terms of Green Belt sensitivity (see maps Options 1-8). This evidence indicates that the Wisley new settlement should be reclassified as low sensitivity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715 Local Plan Reps - July 2016 and Appendices.pdf (11.5 MB)

Comment ID: PSLPP16/18649  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
## Changes Sought

The Vision should refer to ‘at least’ 13,860 dwellings.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Attached documents:

<table>
<thead>
<tr>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule</td>
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<tr>
<td>Appendix C: Infrastructure Schedule</td>
<td>A note should be made that all “likely cost” entries are indicative estimates. AM3 (off-site Cycle Network)</td>
<td>There is no note included referring to “likely costs”. However, the column now refers to the costs “where known”.</td>
<td>Additional of “where known” is a Welcome change. However, WPI still considers that many of the costs are estimates.</td>
</tr>
<tr>
<td></td>
<td>– In accordance with WPI’s comments with respect to the draft allocation A35, the infrastructure provision should be deleted.</td>
<td>The requested change for AM3 is not made. However, costs are now stated as £6.5m (p320).</td>
<td>Change to AM3 are noted. The Local Plan should make policy provision for developers to make fair and reasonable off-site cycle contributions.</td>
</tr>
<tr>
<td></td>
<td>SED2 (Secondary Schools) – The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be ‘determined’.</td>
<td>The requested change to SED2 is made. There are also additional charges included.</td>
<td>WPI Welcome the change to SED2.</td>
</tr>
<tr>
<td></td>
<td>ES1 – Neighbourhood policing centre to be potentially accommodated in conjunction with other community space provision. Delete reference to size.</td>
<td>There are no changes to ES1 or HSC4.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HSC4 – Replace “GP surgery with pharmacy” with</td>
<td>The requested charge to BT2 is not made. However, the funding source has been amended to refer only to the developer (page 318).</td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4127  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Executive Summary

- Wisley Airfield represents an exceptional development opportunity for a Sustainable New Settlement. It is the proposed New Sustainable Settlement within Guildford Borough. Wisley Property Investments Ltd (WPI) strongly supports the draft allocation of the Wisley Airfield site for a sustainable residential-led development of a new settlement (draft Allocation A35) within the submission Guildford Borough Local Plan (GBLP) and Focused Amendments June 2017. The key benefits of the proposal are outlined in the Summary Document, included in Appendix 2 of these representations.

- The draft allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will result in the delivery of homes to meet the urgent and pressing needs. The GBLP should move toward prompt adoption which will provide the much-needed framework for the delivery of development.

- Based on the updated 'objectively assessed housing need' of 654 dwellings per annum (as identified within the 2017 West Surrey SHMA Addendum), GBC proposes an achievable suite of development allocations, and proportionate amendments to the Green Belt boundary, including new areas of Green Belt.

- The Wisley Sustainable New Settlement can deliver circa 210 dwellings in the next five years of the plan period (2017-2022). This figure has been adjusted to allow for the implementation of the significant green infrastructure provision (Suitable Alternative Natural Greenspace – SANG).

- The Wisley Sustainable New Settlement is an obvious location for growth and, as an assembled site, it is available for immediate development and is capable of making a significant contribution to Guildford’s five-year housing land supply and longer-term provision of housing in the Borough.

- Recognition of the suitability of the site as a location for growth is provided through its inclusion as a “given” for provision of 2,000 new homes in all 8 of the June 2017 Sustainability Appraisal’s (SA) reasonable alternatives. WPI welcomes the revised SA.

- Wisley New Sustainable Settlement would deliver around 7,000 sq m of employment and retail floorspace, potentially accommodating some 1,410 direct or indirect jobs (on top of those employed in the development’s construction) and include facilities to support home working, further reducing travel demand. Additional consumer spending in the local area (excluding housing, fuel and power costs, VAT and leakage), based on 2,000
dwellings, would be around £31.86m per annum. The Gross Value Added from the development would be in the
order of £57m per annum.

• The Settlement would complement existing villages, providing additional, well connected local infrastructure
including a new primary and secondary school, leisure and health provision. This will relieve the pressures on
existing services and amenities, such as schools. The development also incorporates a four form-entry secondary
school to meet longer term needs, complementing the two form-entry primary school proposed. The
Development directly facilitates the GBLP.

• The Development will contribute positively to the Surrey County Council (SCC) Surrey Infrastructure Strategy
(2016) and the Appendix C Infrastructure Delivery Schedule of the GBLP. These benefits of the Sustainable New
Settlement have been recognised in the updated SA June 2017, published as part of the Focused Amendments
public consultation documentation.

• The vision for the Sustainable New Settlement remains as that submitted with the 2016 GBLP representations.
The Wisley Airfield site would be a sustainable, successful place that promotes wellbeing, developed by
understanding what people need from the places where they live and work. The proposals engender social
sustainability by combining design of the physical realm with design of the social world – infrastructure to
support social and cultural life, social amenities, systems for citizen engagement, and space for people and places
to evolve. The sustainable communities created would meet the diverse needs of existing and future residents,
their children and other users, contributing to a high quality of life and providing opportunity and choice.

• The Sustainable New Settlement would also enable the delivery of significant SANG. The SANG Strategy
supporting the planning application was developed in liaison with Natural England, who have no objection to the
new settlement. Evidence in respect of the delivery of SANG was produced with WPI’s June 2016 representations
to the Guildford Local Plan: Strategy and Sites Consultation.

• WPI’s only significant concern with the GBLP is the proposal to designate the entirety of Wisley Airfield as a
Site of Nature Conservation Importance (SNCI). This is simply not justified by the available evidence, and fails
to disregard the large areas of agricultural or previously developed land on the site. In addition, a concern is
maintained with respect of the Proposals Map notation of the present Waste designation on part of the site.

• WPI advances other relatively minor objections with respect to certain other draft Development Management
policies.

1. Introduction

1.1. This Representation has been submitted by Wisley Property Investments Ltd (WPI) as part of the consultation on the
emerging Guildford Borough Local Plan: Strategy and Sites (Proposed Submission Version, June 2017) (‘GBLP’). The key
benefits arising from the promotion of land at Wisley Airfield for a Sustainable New Settlement are outlined within the
Summary Document (Appendix 2).

1.2. The Representation highlights, and where necessary expands, upon representations submitted by WPI to the Strategy
and Sites Proposed Submission (June 2016) and specifically addresses the focused amendments made to the GBLP. Some
of these original representations are withdrawn owing to changes to circumstances.

1.3. Full background to the site was provided within the June 2016 representations (summarised in Appendix 1) and is not
repeated here. The key factor to note however is that WPI is the majority landowner within draft Allocation A35. Wisley
Airfield comprises circa 115 hectares (ha), of the circa 132 ha allocation. WPI has been in liaison with agents for
landowners who control land at Bridge End Farm to the south. It is understood that this land is also available for
development as confirmed by representations submitted by CBRE in July 2016. This land is not presently in the planning
system, whereas the WPI land is, being subject to an ongoing S.78 planning appeal. The illustrative masterplan which is
being considered at the planning appeal has regard for the emerging GBLP allocation, and is facilitative and non-prejudicial
on the wider allocation.

1.4. In addition, full technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35)
was included within the June 2016 representations. This fully demonstrated that the proposed allocation and removal of the
site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

1.5. This representation is structured in the same order as the Submission GBLP and specifically addresses the published
focused amendments. The first section of this representation sets out a summary of what is understood to have been
included as focused amendments. This specifically relates to the matters raised in WPI’s representation in June 2016, and
the recommended changes to policy and associated text. A table setting out the summary of the key comments as updated by this representation on the Focused Amendments is included at Table 3.1.

1.6. Following this, a table is produced to provide WPI’s comments and representations on these specific focused amendments.

1.7. WPI is in broad support of the GBLP, and is supportive of the overall provision of housing now proposed. WPI only has a few outstanding technical objections to the GBLP. These are outlined in Table 3.1, with some of the reasoning for certain objections outlined in Section 4:

- The proposal to designate the whole of the WPI land within the proposed allocation as an SNCI has no basis, and does not reflect the available evidence base. The overall policy framework in the emerging GBLP would still permit development on SNCI designations. Notwithstanding this, the requirement in evidence to justify the development on proposed SNCI at Wisley Airfield already exists (see the Environmental Statement and associated SNCI evidence submitted with the planning application / appeal). On this basis, the proposed SNCI designation is simply unjustified, and should be removed from the emerging GBLP.

- The delivery of affordable housing should be expressed as a ‘target’. This change was proposed in our June 2016 representations but has not been made. Instead, GBC proposes that “at least” 40% affordable housing is provided. A new requirement for sums in lieu of on-site provision has been added. In the absence of reference to viability, the policy is unlikely to be effective. This suggestion is made to assist the sound production of the plan. It must be noted that WPI intends to provide 40% affordable housing as part of the draft Section 106 being considered at the forthcoming planning appeal.

- The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations.

- The GBLP should not look to incorporate outdated Minerals and Waste data and therefore should remove specific reference in the Proposals Map to Safeguarded Waste Sites which are part of the Surrey Waste Plan 2008.

- The Sustainability Appraisal (SA) as updated in June 2017, continues to refer to the site as having a medium sensitivity. However, this does not accurately reflect the findings of the Green Belt and Countryside Study 2013 (GBCS) that classified the sensitivity as “low to medium”.

- With specific regard to emerging policy A35, WPI remains in support of the proposed allocation of Wisley Sustainable New Settlement within the GBLP. However, there remain concerns regarding the anticipated retail provision, which does not accurately reflect the evidence base. As part of the pending appeal at Wisley Airfield GBC has withdrawn its objection to the development on the basis of the level of convenience retail provision proposed. This was on the basis of the Commercial Assessment produced by Savills on behalf of WPI and appended to the July 2016 representations to the Emerging Local Plan (Appendix 7). This report demonstrated the level of need for A1 use class space associated directly with the proposed development of Wisley Airfield, and set out the considerable benefits that would arise to the new community. Subsequently, the evidence clearly shows a need for a higher provision of convenience retail space at the Wisley New Settlement and policy A35 should suitably reflect this. GBC has not changed the proposed provision from 600sqm which as evidence demonstrates, will not be sufficient to meet the need. Subsequently, this aspect of the policy remains unjustified.

- In addition, there has been no amendment to the requirements for tenure of traveller pitches, nor has “up to” been included in relation to the number of pitches that are to be provided. Notwithstanding this, it is highlighted that the new settlement application does make provision for 8 pitches.

4. Specific Commentary as Additional Representations on the Focused Amendments

4.1. Section 3 provided an update on WPI’s position on the GBLP as it stands (the Regulation 19, 2016 version with 2017 Focused Amendments). This Section 4 provides specific commentary on the SNCI issue (as supported by Appendix 3) and also with respect of emerging Allocation A35 and the Proposals Map.

Wisley Airfield Allocations - Designation of the Wisley Airfield as a Site of Nature Conservation Importance (SNCI)
4.2. **Clarification Requested (Objection maintained).**

4.3. The Proposals Map and allocation for Wisley Airfield continues to include the land as a Site of Nature Conservation Importance (SNCI) and this is wholly unjustified.

4.4. Part of the site is currently designated a SNCI, and feature of County value. This is accepted by GBC in the Draft Policy Allocation A35 and was originally designated for its assemblage of rare plants.

4.5. Surrey Wildlife Trust (SWT) has long argued that this designation be extended to include the whole site on the basis of bird, and herpetofauna records recorded during surveys between 2004-2007. In their planning application advice to GBC, and in their report to the SNCI review panel, SWT has incorrectly referred to this ‘recommended boundary revision’ as a ‘designated boundary’. WPI has always contested both the boundary extension itself, and SWT’s position regarding the status of the recommended boundary revision.


> “The changes to SNCIs including boundary changes to existing SNCI, deleted SNCI and new SNCI, will in the longer term, be fed into and be formally adopted through the GDF process by way of the Site Allocations DPD and identified on the GDF Proposals Map(s).” “In the interim period, the recommended alterations have been mapped on the Council’s GIS with a note that “this data is a proposed revision to the SNCI boundaries shown in the GBC Local Plan 2003.”

4.7. WPI has continued to object to the boundary change and resultant increased size of the SNCI designation of the Wisley Airfield throughout the local plan process, on the basis of the lack of evidence supporting or justifying the designation.

4.8. As evidenced in Appendix 4 of WPI’s representations made in July 2016, extensive ecology surveys of Wisley Airfield have been undertaken between 2006 and 2016. This provided, and continues to provide, the most accurate and update to date ecology evidence for the Airfield. The results were reported in the ES accompanying the planning application for the Airfield and within a technical note produced to inform the Surrey Local Sites Partnership SNCI Review (**Annex A of Appendix 3**), which was also shared with GBC.

4.9. In addition, WPI’s appointed ecologist accompanied SWT during their update botanical surveys at the Wisley Airfield, including Wisley Field SNCI on four occasions in 2016, also collecting botanical data as summarised in the technical note supporting the July 2016 Representations (**Appendix 4**).

4.10. The up to date evidence available clearly demonstrates that there are only some areas within the wider Airfield site that have the potential to qualify for an SNCI designation, and that the vast majority of the Wisley Airfield has a limited nature conservation interest, not supporting features that could be considered as meeting the SNCI qualifying criteria. The proposed designation as shown on the Proposals Map and Allocation Map for Wisley Airfield, is based on out of date evidence that has been superseded and cannot therefore be considered sound. Its inclusion as part of the Plan fundamentally puts the site at risk of being considered undeliverable, which risks the soundness of the Plan at examination.

4.11. Further evidence and commentary on this matter is contained in Appendix 3, a report prepared in response to the proposed designation by WPI’s appointed ecologist, Ecological Planning and Research Ltd (EPR).

**Changes Sought:**

4.12. The proposed designation of the Wisley Airfield as an SNCI should be corrected to appropriately reflect the up to date, site specific evidence that is available as undertaken between 2006 and 2016 (inclusive).

4.13. The GBLP proposals Map should be updated to show the amended SNCI boundary to reflect the EPR’s proposal map at **Appendix 3, Annex A, Map 1**.

**Wisley Airfield Allocation – Policy A35 & Proposals Map**

4.15. Wisley Airfield is allocated through policy A35. It is positive to see that the table of sites provided onwards of page 141 of the GBLP now refers to the “gross” number of dwellings (approx.) to be provided “over the plan period”. This acknowledges that some sites may be capable of contributing to additional development delivery beyond the plan period, although WPI fully appreciate that this has not been explored by GBC.

4.16. With respect to the changes made to policy A35, WPI is, in the main, supportive, and welcomes the changes that are proposed by the Focused Amendments. However, some objections are maintained. Specifically, WPI strongly believe that there should be a definition of “approximately” included in the glossary. For clarification purposes, this should make it clear that approximately is plus or minus 10%. Whilst this may only appear as a minor addition, the additional clarity provided will help secure the soundness of the plan and ensure it is appropriately interpreted after adoption.

4.17. Policy A35 allocates 8 Gypsy and Traveller pitches at Wisley Airfield. This should be amended to state “up to 8 Gypsy and Traveller Pitches”. In addition, parts 14 to 20 (inclusive) refer to the tenure of the pitches, and that these should be provided at “nil cost”. Both paragraph should be deleted. The matter was covered in our previous representations on the GBLP. The reason being to ensure plan effectiveness and flexibility.

4.18. With the exception of these amendments, WPI fully supports the proposed policy allocating Wisley Airfield. All other objections previously raised to the policy are now withdrawn.

Proposals Map:

4.19. Clarification Requested (Objection maintained).

4.20. WPI continues to raise a technical concern with respect of the ongoing recognition / designation of a waste allocation on the Proposals Map, within the designation for a new settlement. This is not the role nor purpose of a local plan.

5. Conclusion

5.1. WPI has made a number of representations on the GBLP following the publication of the focused amendments, June 2017. These representations update WPI's position.

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<td>Site Allocations – Wisley New Settlement – Proposals Map</td>
<td>Amend SNCI area. See Appendix 3 Adopt a consistent approach towards safeguarded waste sites. Refer to the Surrey Waste Plan factually as an outgoing Plan, highlighting that waste allocations and safeguarded sites are likely to change in the Revised Surrey Waste Plan. Either remove safeguarded waste sites from the Policies Map or amend the</td>
<td>Amendment to the Proposals Map. Retained proposal to designate whole site as an SNCI. No change to reference of Safeguarded Waste Sites.</td>
<td>Objection maintained in relation to SNCI area. Objection maintained in relation to waste. The Local Plan should not be covering outdated Minerals &amp; Waste matters. This is a matter for Surrey County Council.</td>
</tr>
</tbody>
</table>
| Policy A35 (Wisley New Settlement) | Amend the requirement for approximately 100 sheltered/ Extra Care homes to be “C2 or C3” use.  
Amend the convenience retail provision to read “1,200 sq m”.  
Amend the paragraph with respect to off-site cycle network enhancements, as follows:  
"Preserve and enhance the existing off site cycle network from the Land at former Wisley airfield site to key destinations including: Effingham Junction railway station, Horsley railway station, Station Parade and Ripley with including cost-effective improvements to a level that would be attractive and safe for the average cyclist.”  
The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be “determined”.  
Amend the bullet point with respect to ‘sensitive design’ as follows: "The delivery of a new settlement provides an opportunity for distinctive character and unique and quality design. A balance should be achieved to enable a design that meets these principles and is designed with the landscape.”  
Delete the requirement for an application level ‘Habitat Regulation Assessment’. This is the role of GBC as the competent Authority.  
Delete the bullet point with respect to site access/ egress and flood risk mitigation – this matter will be addressed in the application FRA.  
Delete the bullet points which refer to the tenure requirements for the traveller

| (Pages 225 to 227). Varied changes have been made to the policy. This includes an amendment to say “C2 Use” only.  
No change to amount of convenience retail provision. This still reads 600sqm. There focused amendments do not change the policy wording as requested with regard to removal of Effingham Junction, Horsley and Ripley. Instead, the policy includes an additional location - “Byfleet”.  
The policy wording is charged to “determined” in relation to assessment of secondary education needs.  
The paragraph on “sensitive design” has been removed and replaced with a new section under “other issues” (para 22).  
The requirement for an application level HRA has been removed from the policy (see p226).  
Paragraphs relating to access and egress have been deleted (p226). The flood zone comments have been moved to “other issues” at para 21.  
The requested changes relating to tenure and traveller pitches have not been made.  
No definition of “approximately” has been added to the glossary.  
A new section has been added on “opportunity” and two bullets are included relating to creating unique places and incorporating high quality architecture.  
It is also noted that there are two new paragraphs relating to the existing Air traffic beacon at Wisley airfield (8)

| Further commentary on this representation is provided in Section 4. WPI welcome the clarification regarding “C2” uses.  
Objection maintained in relation to retail provision. This does not reflect the evidence base and hence is unjustified.  
Addition of “Byfleet” is noted. The paragraph is supported by the evidence base, and IDP, which outline the need for off-site contributions.  
WPI welcome the changes relating to education needs and sensitive design.  
WPI support removal of requirement for an HRA.  
WPI support and welcomes the change regarding access and egress.  
Clarification Requested (Objection is maintained) in relation to tenure and traveller pitches, notwithstanding the fact that the new settlement application makes provision for 8 no. new pitches.  
Clarification Requested. Definition of “approximately” as requested by WPI would provide additional plan clarity. |
Include reference to ‘up to 8 traveller pitches’. In addition, the GBLP should include a Glossary, which defines "approximately" as ‘±10%’.

The overall phasing of the Wisley new settlement should reflect the phasing provided in this Representation. This should be within the housing trajectory of the GBLP and associated evidence base.

For consistency – delete the bullet point related to ‘opportunity’ – as it is not apparent what this means, and no other major strategic site has this bullet point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy D1: Making Better Places Page 94</td>
<td>Include an additional paragraph to the policy: &quot;Distinctive character and quality design opportunities should be taken into account at major strategic sites or new&quot;</td>
<td>(Page 106) Policy is now called “Place Shaping”. The requested additional paragraph has not been included. However, the requirements for developments of 25 or more</td>
<td>WPI welcome the clarification and additional flexibility provided which is more effective.</td>
</tr>
</tbody>
</table>
units are now more flexible as a result of the replacement of “must” with “should”.

A new bullet point (e) has been added, stating that development should be “designed to facilitate the delivery of high quality communications infrastructure to support sustainable modern living”.

Previously stated development criteria has been removed.

The supporting paragraph 4.5.8 has been removed and replaced by a new paragraph 4.5.8a, relating to broadband.

Objection withdrawn, on the basis of the additional high quality design/architecture text added to policy A35.

Other changes relating to bullet point (e) and development criteria area noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Policy D2: Sustainable Design (Energy / CHP)**

4.21. Clarification Requested (Objection maintained).

4.22. Policy D2 has been amended by GBC to provide some clarification and additional flexibility on sustainable design requirements. However, fundamentally, the policy remains unjustified and contrary to national planning policy, largely repeating matters which are, and should be, covered by the Building Regulations (Part L).

4.23. The Focused Amendments continue to go above and beyond the requirements of the Housing Standards Review, by setting additional technical standards relating to construction and performance of new dwellings. The Written Ministerial Statement of 25 March 2015 (Planning Update: Written statement - HCWS488) made it clear that upon enactment of the Deregulation Bill (now Deregulation Act 2015) “local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”

4.24. Furthermore, the WMS made it clear that the optional new national technical standards should only be required through any new local plan policy if they address a clearly evidenced need and where their impact on viability has been considered. GBC, in its updated Sustainability Topic Paper (June 2017), has acknowledged that it should not seek to exceed
the Building Regulations requirements unless there is a compelling reason to do so (para 2.14). Essentially there needs to be a specific, well evidence, local justification for setting standards that are above those in the Building Regulations.

4.25. The Updated Sustainability Topic Paper refers to national objectives and targets but there is limited, if any, local justification provided and with the exception of brief references to the 2013 Guildford Borough Environmental Sustainability and Climate Change Study (ESCC), it is not clear where the evidence to support the Council’s approach is located.

4.26. GBC’s argument for the approach in policy D2 is that there is no “quantifiable target” but rather, a design standard that is set by a “qualitative standard” to achieve the lowest level of carbon emissions or the highest level of efficiency. Whilst no specific figures are stated in the policy, the policy continues to enable GBC to raise objections to development on the basis that standards, in excess of those set out in the Building Regulations, are not being met, and thus enables GBC to exceed the requirements of the Standards Review, the purpose of which was fundamentally to assist with the faster delivery of development. The policy, or associated text should at the very least, make it clear that the targets being sought will reflect current Building Regulations requirements.

4.27. The Focused Amendments have sought to make the policy wording clearer and in some instances more flexible, and this results in a policy that is more effective. However, whilst it is agreed that the wording is clearer, carbon reduction targets have increased, without the relevant local justification being provided. Although some flexibility has now been inserted into the policy paragraph 9, WPI’s objection is maintained in respect of policy D2 as regards the carbon requirements.

4.28. WPI recommended, in representations to the Submission GBLP that the policy requirement for Combined Heat and Power (CHP) was amended to be encouraging. It was highlighted that WPI believed this to align more appropriately with national policy and guidance supporting carbon reduction and decentralised energy, and ensuring that viability of CHP was considered. It is disappointing to see that there has been no change to policy D2 in relation to CHP provision and therefore the flexibility required to policy D2 is not in place. Subsequently, WPI maintains their objection on the basis that the NPPF clearly recognises that pursuing sustainable development requires careful attention to viability and costs (para 173).

4.29. WPI also recommended that policy D2 was updated to include reference to viability and feasibility in relation to support for zero carbon development. However, no reference to such factors is included, and subsequently, WPI remain of the view that the policy is ineffective.

Changes Sought

4.30. The policy should reflect the Housing Standards Review, and therefore require a fair and reasonable approach to carbon reduction, which takes full account of economic viability and technical feasibility factors.

4.31. The requirement for CHP connection for any development should be amended, to make clear that the policy is ‘encouraging’ rather than requiring CHP to be provided.

4.32. Carbon reduction requirements should be returned to 15% as per the Submission Plan, unless GBC can provide sufficient, local justification to require this standard.

<table>
<thead>
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</tr>
</thead>
<tbody>
<tr>
<td>Policy D2: Sustainable</td>
<td>The policy should reflect the Housing Standards Review, and therefore require a fair and reasonable approach to carbon (Pages 109 and 110).</td>
<td>WPI welcome the clarification to the policy to provide additional</td>
<td></td>
</tr>
</tbody>
</table>
The policy (paragraph 9) has changed to required 20% rather than 15% carbon reduction. However, measures are to be provided in the locality rather than on site.

A new paragraph 10 has been added to the policy. This states that “A Use Classes” in Guildford will not be subject to the requirements of para 9.

Wording of policy D2 has slightly changed from “must” to “are required to”.

The suggested text relating to CHP connections has not been included in the Focused Amendments.

The policy (paragraph 9) has changed to required 20% rather than 15% carbon reduction. However, measures are to be provided in the locality rather than on site.

A new paragraph 10 has been added to the policy. This states that “A Use Classes” in Guildford will not be subject to the requirements of para 9.

Wording of policy D2 has slightly changed from “must” to “are required to”.

The suggested text relating to CHP connections has not been included in the Focused Amendments.

**Clarification Requested (Objection Maintained).**

However, WPI question the justification for a carbon reduction increase in the amendment policy.

Further commentary on this representation is provided in Section 4.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2753  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy/ Section / page / para</th>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E2: Location of New Employment</td>
<td>Include an additional bullet point within the draft policy, under bullet point 2: &quot;Proposed local centres, or defined employment locations within proposed strategic site allocations, as outlined in Table 1 and the Proposals Map”</td>
<td>(Page 75) Table 1 has been removed from the Plan.</td>
<td>Support clarification to the policy.</td>
</tr>
</tbody>
</table>
Floorspace Page 67

The specific wording requested has not been included as a focused amendment but there is a new reference to a sequential test.

A new para 2 has been added stating that the sequential test does not apply to allocations.

Objection withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2754  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

<table>
<thead>
<tr>
<th>Policy/Section / page / para</th>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E7: Guildford Town Centre Page 85</td>
<td>WPI supports the draft policy. (Page 94) The vision has been removed from the supporting text to policy E7. Proposals for Guildford Town Centre are to be provided by 2034 (previously 2033) and the gross floor space expected at North Street Regeneration Site has been reduced from 45,000sqm to 41,000sqm. The number of new homes expected to be provided in Guildford Town Centre has increased from 1,172 to 1,300. Last 4 bullets from part (a) of policy E7 have been removed (relating to varied uses during the evening; active riverside uses; effective cycle and pedestrian routes; new public squares).</td>
<td>Changes are noted. Maintain support and note the increase in planned town centre housing.</td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2748  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy/Section</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy H1:</td>
<td>Add text to Density:</td>
<td>(Pages 35 to 38) Requested text has not been added. Reference to Density has been completely removed from the policy and supporting text. New sections have been added to the policy on self and custom build and accessible homes.</td>
<td>Welcome change. Objection withdrawn, on the basis of the additional high quality design/architecture text that has been added to policy A35.</td>
</tr>
<tr>
<td>Homes for All</td>
<td>'Distinctive character and unique design opportunities should be taken into account at major strategic sites or new settlements such as Wisley Airfield'</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Page 31</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2749  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy H2: Affordable Homes Page 38</td>
<td>The draft policy should require a ‘target’ of 40% affordable. A clear viability clause is required within the draft policy wording itself. Add <strong>“In seeking affordable housing, where the full target provision cannot be met, the Council will assess a scheme viability”</strong></td>
<td>(Pages 44-45) The revised policy refers to an “at least” requirement rather than a “target” requirement. No viability clause has been added to the policy, nor has the proposed additional text. Instead, stricter requirements are included regarding off-site contributions in lieu of on-site affordable housing provision. There are <strong>including assessing the overall mix of affordable, unit size and tenure”</strong> The supporting text, rather than the policy, should refer to any tenure split requirements, though the detail would be best left to supplemental guidance, based on the relevant SHMA or other housing needs evidence. The GBLP must be consistent with the Housing and Planning Act 2016 and anticipated further guidance/Regulations. Delete the reference to nil land value within Policy H2. This is uneconomic, and unlikely to meet the NPPF requirements. The Guildford Local Plan Viability and Affordable Housing Study (2014) is not based on an assumption of nil land value. associated changes to the accompanying text at paragraph 4.2.38. There has been no change to the policy with regard to the Tenure Split requirements at bullet point 3. Reference to “Nil Land Value” has been removed from the policy.</td>
<td>Clarification Requested (Objection maintained). The policy is unlikely to be effective with regard to affordable housing requirements and viability. Clarification Required (Objection maintained) as the matter of tenure split remains too detailed for a Local Plan Policy and hence, the policy is likely to be ineffective. Welcome change to the removal of “Nil Land Value”.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2758  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)
Policy/Section/page/para: Original Changes requested (July 2016 Representation)

Policy I1: Infrastructure and Delivery Page 108

The policy should be amended to include reference to wider funding streams, including Central and Local Government finance, and Local Enterprise Partnership funding. These are relevant infrastructure funding streams, in addition to developer contributions and CIL.

The policy should also make clear reference to "the phased delivery of infrastructure to meet identified needs and enable associated wider benefits, in accordance with the CIL Regulations".

Understanding of changes shown in the Focused Amendments (June 2017)

(Pages 122 and 123).

The title of the policy has changed to “ID1” and there are considerable changes to the policy text.

The requested clarification on means of funding has not been included.

Phasing is now mentioned but the specific wording requested is not included.

WPI Comments (Updated Representation)

New policy title and details are noted, notably the reference to phasing.

Objection withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Policy I2: Supporting the DfT’s RIS Page 111

<table>
<thead>
<tr>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WPI supports the draft policy.</td>
<td>(Page 126). The Title of the policy has changed to “ID2”. The requirement relating to RIS has also been amended to state that “promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England….”</td>
<td>WPI welcomes the clarification.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2761 **Respondent:** 9079393 / Wisley Property Investments Ltd. **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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### Policy I3: Sustainable Transport for New Developments Page 113

<table>
<thead>
<tr>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WPI supports the draft policy.</td>
<td>(Pages 128 to 130). The title of the policy is now “ID3.” There have been changes to the policy wording which now appears more robust. For example, “new development will be required to, in so far as its site’s size, characteristics and location allow, to maximise…” This has replaced the text “we will expect new development to…” New paragraphs have been added on the</td>
<td>Changes noted.</td>
</tr>
</tbody>
</table>

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Page 444 of 3142
sustainable movement corridor (3), parking (4) and the Guildford parking strategy (5). In addition, new reference is made to provision of car club (6).

Clarification has been provided on the need for new development to provide or fund access and transport infrastructure (7).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2762  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy I4: Green and Blue Infrastructure Page 118</td>
<td>WPI supports the draft policy. (Page 136) Minor wording changes only.</td>
<td>Changes noted.</td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2750  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Policy/Section / page / para

<table>
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<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy P1: AONB Page 47</td>
<td>WPI supports the draft policy.</td>
<td>(page 52) General changes have been made to the policy, including additional reference to “Area of Great Landscape Value”.</td>
<td>General changes to the policy are noted. Continued support.</td>
</tr>
</tbody>
</table>

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** pslp171/2751  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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</thead>
<tbody>
<tr>
<td>Policy P5: TBH SPA Page 58</td>
<td>Amend the first paragraph of draft policy to read: “Permission will not be granted for development proposals unless it can be demonstrated, through the provision of objective evidence, that the proposals would not be likely to contribute to likely significant effects on the Thames Basin Heaths Special Protection Area (SPA), either alone or in combination with other plans and projects, or if this is not possible, through an Appropriate Assessment that demonstrates that there will not be any adverse effect on…” This change will ensure that the test applied through Policy P5 accords both with principles that underlie the endorsed JSPB Delivery Framework (2009) and Policy NRM6 of the South East (Pages 65 and 66) The requested changes and additions to the policy have not been included in full. Reference to a SANG being “approved” by Natural England have been changed to “agreed” by Natural England.</td>
<td>Welcome change. Other representations withdrawn.</td>
<td></td>
</tr>
</tbody>
</table>
Plan. In addition, the last bullet point of the draft policy is technically incorrect. GBC is the competent authority and decision maker. Hence, proposals for new SANGs cannot and should not be ‘approved’ by Natural England. Rather, Natural England is a key consultee. GBC’s own ‘TBH SPA Avoidance Strategy 2009-2016’ should be cited at paragraph 4.3.50, 4.3.64 and within the ‘Key Evidence’ section.

The requested reference to the TBH SPA Avoidance Strategy has not been included in the policy or associated text. However, there have been general changes with the removal of paragraph 4.3.50 and its replacement with paragraphs 4.3.50a, 4.3.50b and 4.3.50c. Though on the basis of wider amendments to the GBLP, this concern is no longer paramount.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

ATTACHED DOCUMENTS:

Comment ID: pslp171/2747  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>WPI Comments (Updated Representation)</th>
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<tbody>
<tr>
<td>Policy S2: Borough Wide Strategy Page 26</td>
<td>Draft policy S2 should refer to ‘at least’ 13,860 dwellings. The draft policy should refer to the following sources of land supply: - Completions in the period 1st April 2013 – 31st March 2016</td>
<td>(Pages 30 and 31) An “at least” requirement has been added. However, the housing requirement has reduced to 12,426 by 2034 from 13,860 by 2033.</td>
<td>Welcome change to the reference to ‘at least’ and also ‘approximately’.</td>
</tr>
</tbody>
</table>

Welcome change to the reference to ‘at least’ and also ‘approximately’. |
- Existing
Commitments unimplemented at 1st April 2016
  • Proposed allocations to be delivered in the period 2016-2033
  • Proposed windfall allowance in the period 2013-2033

The phasing allowance in the plan should commence in 2016 and not 2018.

The overall phasing of the Wisley new settlement should reflect the phasing provided in this

Representation (see comments on draft Allocation A35). This should be within the housing trajectory of the GBLP and associated evidence base.

Changes are also made to composition of housing, for example, requirements from urban areas have changed from “over 2,800” to “approximately 3,000” units.

Changes are also made to the employment space requirements.

The four bullet points sought in respect of supply have not been included.

The phasing allowance in the policy has changed from commencement in 2018 to commencement in 2019/20. There is however no detail provided in relation to phasing for Wisley New Settlement.

Table 1 of the GBLP should be clarified, to outline the numbers of planned houses as ‘approximates’ and whether this includes C2 uses in addition to C3. The delivery of the Wisley new settlement is noted in plan period 1-15 years. This is supported. The intended delivery is entirely within the period 2017-2031

(Page 32)
Table 1 has been removed from the Plan, as has Table 2 (although this is now included in Appendix B at page 306).

Welcome change.
Objection withdrawn.

Table 1 Page 29

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/419  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. Commentary on the Updated Evidence Base

2.1. The evidence base supporting the 2017 Submission GBLP has been updated since the 2016 publication. The current evidence base now comprises the following:

- Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (June 2017)
- Assessment of Sites for Amenity Value (2017)
- Assessment of Viability of Carbon Emission Targets for New Builds (April 2017)
- Borough, Economy and Infrastructure EAB Report Sustainable Movement Corridor Update (February 2017)
- Employment Land Needs Assessment (2017)
- Guildford Local Plan and CIL Viability Study (2014)
- Guildford Town and Approaches Movement Study: Equality Impact Assessment (March 2015)
- Habitat Regulations Assessment (June, 2017)
- Land Availability Assessment (2016)
- Land Availability Assessment Addendum (2017)
- Open Space, Sport and Recreation Assessment (2017)
- Retail and Leisure Study Addendum (February 2017)
- Strategic Highway Assessment Report (June 2016)
- Strategic Highway Assessment Report Addendum (2017)
- Strategic Housing Land Availability Assessment (SHLAA) (May 2014 Update)
- Sustainability Appraisal (June 2017) and non-technical summary (2017)
- Topic paper 2017 - Flood Risk
- Topic paper 2017 - Environmental Sustainability and Climate Change
- Topic paper 2017 - Green and Blue Infrastructure
- Topic Paper 2017 - Retail and Town Centre
- Topic paper 2017 Leisure and Tourism
- Topic paper 2017 - Duty to Cooperate
- Topic paper 2017 - Employment
- Topic paper 2017 - Green Belt and Countryside
- Topic paper 2017 - Housing Type Tenure and Mix
- Topic paper 2017- Housing Delivery
- Topic Paper 2017 - Transport
- Traveller Accommodation Assessment (2017)
- West Surrey Strategic Housing Market Assessment (September 2015)

2.2. The evidence is referred to in this Representation where appropriate.

Sustainability Appraisal (SA)

2.3. WPI previously objected to the draft Sustainability Appraisal (SA) (2016 version). This objection is withdrawn, on the basis of the 2017 SA which is now supported.

2.4. In the 2017 SA, the expected housing to be delivered through each site is either referred to as “givens” (i.e. it will come forward) or “variables” (may come forward). Those which are “givens” include housing completions and commitments since the start of the plan period, an assumption for windfall sites and an assumption for rural exception sites (see footnote 38 page 34).
2.5. Wisley Sustainable New Settlement, as identified as project “tier 9” (page 32), with the associated provision of 2,000 dwellings is stated to be “a given”. The change from being regarded as “a variable” from the 2016 SA is strongly supported by WPI and GBC’s comment that there is now a “greater degree of confidence in the potential for a new settlement at the site to be suitable, with the right planning application” is a welcome addition to the SA.

2.6. There is a slight error in the SA in that Wisley Sustainable New Settlement is categorised in two places with two different “tier” numbers. See in particular table 6.3 (page 39) which refers to the site as “tier 8” compared with the detailed text at paragraph 6.6.12 whereby the provision of a new settlement is referred to as “tier 9”. This should be clarified to avoid confusion.

2.7. There are now 8 reasonable alternatives considered in the updated SA, and this has built upon the 2016 SA. WPI supports the inclusion of Wisley Sustainable New Settlement in all of these reasonable alternatives for the delivery of 2,000 dwellings, and the fact that all 8 Options propose to exceed the OAN over the plan period. These 8 options are summarised in Table 2.1.

Table 2.1: Summary of the 8 Reasonable Spatial Strategy Options Assessed in the SA 2017

<table>
<thead>
<tr>
<th>Option</th>
<th>Total Housing provision</th>
<th>Variation on OAN</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>13,600</td>
<td>9.4%</td>
</tr>
<tr>
<td>2</td>
<td>14,080</td>
<td>13.3%</td>
</tr>
<tr>
<td>3</td>
<td>14,200</td>
<td>14.3%</td>
</tr>
<tr>
<td>4</td>
<td>14,600</td>
<td>17.5%</td>
</tr>
<tr>
<td>5</td>
<td>14,680</td>
<td>18.1%</td>
</tr>
<tr>
<td>6</td>
<td>15,080</td>
<td>21.4%</td>
</tr>
<tr>
<td>7</td>
<td>15,200</td>
<td>22.3%</td>
</tr>
<tr>
<td>8</td>
<td>15,680</td>
<td>26.2%</td>
</tr>
</tbody>
</table>

2.8. The “given” sites, including Wisley Sustainable New Settlement, contribute to circa 8,317 dwellings of the total provision. The contribution of Wisley Airfield to the given housing contribution of 8,317, is 24%. Evidently, the site is a fundamental aspect of all growth options for the GBLP and Local Authority area as a whole. This positively reflects the ongoing discussions and proactive work that has been undertaken with GBC over the last 12 to 18 months.

2.9. The remaining contributions for the above 8 options are to come forward through a combination of “variable” sites, notably comprising development sites in the countryside beyond the Green Belt, Green Belt urban extensions to Guildford, or Green Belt urban extensions to villages.

2.10. It is positive to see that GBC are considering all options for growth, taking forward those from the 2016 SA and recommendations to explore alternative strategic options.

2.11. The SA indicates that GBC’s preferred option is Option 1, delivering 9.4% above the OAN. Whilst WPI does support the intention to exceed OAN, particularly in light of their representations made to the Submission GBLP in July 2016, whereby it was suggested a 6% buffer would be appropriate, Option 1 provides the smallest additional buffer above OAN, and GBC fully acknowledges that this is likely to result in unmet need within the wider Housing Market Area (HMA). Subsequently, in order to help address the housing needs of the wider HMA, and as part of the Duty to Cooperate, WPI believe that GBC should consider implementing an alternative Option as part of the GBLP.

2.12. With specific regard to Wisley Sustainable New Settlement, the maps contained within the SA all continue to refer to Wisley Airfield as having a “medium” sensitivity. Although this is based on the Green Belt and Countryside Study 2013, there is no change to correctly reflect the findings that the site is “low to medium sensitivity”. WPI’s representations made to the Submission GBLP in July 2016 clearly emphasised the importance of this being accurately reflected in the SA. WPI continue to recommend this change.

2.13. Chapter 10 of the updated SA includes site specific comments on Wisley Airfield. Where concerns are raised, these have been addressed through technical work undertaken on behalf of WPI, both in respect of the allocation of the site in the Emerging GBLP and in relation to the ongoing appeal at the site. For example, a drawback of Option 1, as noted in the SA,
is that Wisley Airfield is regarded as being “particularly sensitive” from a biodiversity perspective. However, technical work has been undertaken, in addition to consultation with Natural England, both of which are then noted in the SA (para 8.2.2) and suitable mitigation measures can be provided. Refer in particular to the Appendix 4 of WPI’s July 2016 representations to the Submission GBLP which contains an Ecology Technical Note and Natural England Consultation Reply. Further details are also provided in Appendix 3, whereby an addendum report, produced by Ecological Planning and Research Ltd (EPR), is contained, which outlines the reasons why the proposed SNCI designation for the entire site is not justified.

2.14. The updated SA includes the assessment for Wisley Airfield. This is reproduced in Table 2.2 below.

Table 2.2 SA of Wisley Airfield strategic development site

[see attachment for table]

2.15. It is noted that there is now one less category in the SA, namely, the size of the site. However, other than this change, there is no change between the conclusions of the 2016 and 2017 SA for Wisley Airfield. This is supported.

2.16. In respect of Table 2.2, it is noted that a number of the criterion where Wisley Airfield has scored ‘red’ (negative impact) are addressed by the emerging policy A35.

- SNCI – This designation is unjustified as outlined by the available evidence and this representation.
- Key Employment Site – large scale employment is not proposed as part of the allocation, however some employment is and thus the SA may better reflect this as a neutral factor.
- Healthcare – the delivery of a new settlement will have an impact on healthcare, hence the requirement in emerging policy for this designation.
- District/local centre – by definition a new settlement will not benefit from existing centres, The creation of a new village centre (as a local centre) is an integral part of emerging policy.
- Healthcare – the delivery of a Sustainable New Settlement will have an impact on education, hence the requirement in emerging policy for a new primary/secondary school, and for nursery provision.
- Agricultural land – as demonstrated in evidence, the delivery of Wisley new settlement on WPI land will result in a net lost of Best & Most Versatile Agricultural land of less than 20 hectares.
- Railway Station – the emerging GBLP, including the Infrastructure Delivery Plan, and emerging policy A35 requires a bus based sustainable transport strategy, which will ensure direct linkages to Horsley and Effingham Junction railway stations. By definition only, is the new settlement not located on a railway line.

2.17. In addition, WPI makes the further Site specific comments on the SA, including those on communities (Para 10.4.4) which refer positively to the contribution to community infrastructure, but negatively regarding the distance from a town centre and potential impacts (excluding possible A3/M25 upgrades). This is further noted in paragraph 10.16.5 where it states that the site does not perform well based on its location, but its scale provides good potential for high quality bus services and cycle routes. Upgrades to the highway network are noted.

2.18. Paragraph 10.8.3 refers to the historic environment but notes that there is good potential to mitigate impacts through site specific policies which have been strengthened following the 2016 SA.

2.19. On housing, see paragraph 10.9.8 which indicates a need for some specialist housing and self-build plots on strategic sites including Wisley.

2.20. A recommendation is included at paragraph 10.19.3 for the site specific policy for Wisley Airfield to ensure that impacts on the SNCI are minimised.

Changes sought

- Correct relevant references to ensure that Wisley Airfield is referred to as a ‘Tier 9’ settlement (and not Tier 8).
- Revise the classifications of Low, Medium and High sensitivity Green Belt to reflect the GBCS 2013 noting that the Wisley new settlement is ‘low to medium sensitivity’.
- Consider slight revisions to the SA analysis of Wisley Airfield in response to the comments made in this representation.
2.21. None of the comments made by WPI go to the heart of the SA, and are made purely as clarifications.

**Land Availability Assessment (LAA)**

2.22. The addendum to the LAA (2017) includes a new housing trajectory for the plan period. Table 2.3 shows the stated delivery rate for Wisley Sustainable New Settlement. The proposed trajectory identifies strong reliance on the delivery of dwellings from Wisley Airfield in the first ten years of the GBLP.

**Table 2.3 Extract from the LAA housing trajectory**

[see attachment for table]

2.23. WPI makes no detailed comment on emerging housing or spatial strategy policy S2. The emerging context is of relevance, and highlights the importance of the early delivery of the GBLP.

2.24. The Examination process into the Waverley Local Plan is presently ongoing. The District is relevant as it forms part of the West Surrey Housing Market Area as Guildford (along with Woking).

2.25. The Inspector for the Waverley EiP acknowledged the significant requirement for affordable housing within the HMA, recommending 25% uplift on OAN to reflect affordability pressures.

2.26. In addition, The Inspector has recommended that Waverley should be taking 50% of the unmet need from Woking and has asked for the Council’s housing figure to be increased to 590 dpa. I understand the break down to be as such:

- 396 dpa starting point
- 495 dpa to give a 25% uplift
- + 12 dpa to account for affordable housing need, household formation and London migration
- + 83 dpa to meet 50% of Woking Borough’s unmet need

2.27. WPI makes no comment on the issue of unmet need. WPI simply wishes to note that the need to deliver homes promptly in GBC, notably in locations close to Woking (such as Wisley) are therefore of increased relevance. Thus, the wider Housing Market Area should rightly have influence over the proposed GBLP housing trajectory.

**Changes sought**

- None. It should however be noted that the trajectory which is being promoted by WPI envisages the delivery of dwellings from 2020/21, and a faster build out to 2031/32.

**Infrastructure Delivery Plan (IDP)**

2.28. WPI notes the IDP as the same as the 2016 version. No further comments.

**Topic Paper – Housing Delivery**

2.29. The 2017 Housing Topic Paper continues to provide strong and reasoned justification for the allocation of Wisley Airfield, and hence is supported. The Topic Paper is helpful explanation of the emerging GBLP.

**Topic Paper – Sustainability and Environment.**

2.30. WPI’s comments on this Topic Paper are largely provided in relation to policy ID2. In particular, it is noted that there is limited (if any) location specific evidence to support the proposed targets and strategy for sustainable construction and development, over and above the National Standards Review.

**Topic Paper – Blue and Green Infrastructure.**

2.31. WPI’s comments on this Topic Paper are provided in this representation with particular regard to the Strategic allocation policy A35 for Wisley Airfield. A supplementary commentary is also provided by WPI’s appointed ecologist
3. WPI Updated Position with respect of Representations on the GBLP

3.1. Representations were submitted to GBC in July 2016 in respect of the Submission version of the Emerging Local Plan. A summary table is included (see Appendix 1) setting out these representations and the original changes sought to the emerging GBLP. This is for reference only.

3.2. This Section reviews the changes now proposed through the Focused Amendments Local Plan, in light of the summary table from WPI’s July 2016 representations and additional comments are made by WPI in respect of those proposed changes. WPI’s additional comments and representations on the Focused Amendments are therefore provided in this section.

Table 3.1 Table examining Focused Amendments in light of the changes sought by WPI in the submission Local Plan (July 2016).

[see attachment for table of representations]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp17q/509  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is not clear why completions and existing commitments form part of the assessment. Test a new Option ‘2A’ including the Wisley new settlement, which would represent OAN plus 6% buffer (14,744 dwellings). Amend the SA text with respect to the Wisley new settlement on page 26, to ensure in particular that it is consistent with the Housing Delivery Topic Paper (June 2016) in respect of the positive benefits of the Wisley new settlement. This should make clear that there are no matters which call into question the suitability of the A New Sustainability Appraisal has been published dated June 2017. Welcome new Sustainability Appraisal, and inclusion of Wisley New Settlement within all the options for assessment. Minor clarifications requested.
site for a new settlement. Revise the classifications of Low, Medium and High sensitivity Green Belt, noting that the Wisley new settlement is "low to medium sensitivity".

"greater degree of confidence in the potential for a new settlement at the site to be suitable, with the right planning application".

There are 8 reasonable alternatives. Wisley is included in all of them as "a given" site delivering 2000 homes. See table 6.3 page 39. Note that tier numbers have slightly changed but reflects whether sites are a given or a variable. Maps show that Wisley former Airfield has a "medium" sensitivity. Although this is based on the Green Belt and Countryside Study 2013, there is no change to reflect the findings that the site is "low to medium sensitivity".

Of the 8 reasonable alternatives, GBC’s preferred approach is Option 1 which delivers 13,600 dwellings with a 9.4% buffer over OAN. This is the lowest delivery of all options (see table 6.3 on page 39). The SA recognises that Option 1 meets the Borough OAN but is likely to result in unmet need within the HMA.

In terms of drawbacks on option 1, Wisley Airfield is noted to be "particularly sensitive" from a biodiversity perspective but the technical work undertaken, in addition to consultation with Natural England, is noted (para 8.2.2). This is further explored at paragraphs 10.2.4 and 10.2.5 whereby mitigation to reduce impact on biodiversity, is referenced.

Site specific comments in the SA include those on communities (Para 10.4.4) which refer positively to the contribution to community infrastructure, but negatively regarding the distance from a town centre and potential impacts (excluding possible A3/M25 upgrades).

This is further noted in paragraph 10.16.5 where it states that the site does not perform well based on its location, but its scale provides good potential for high quality bus services and cycle routes. Upgrades to the highway network are noted. Paragraph 10.8.3 refers to the historic environment but notes that there is good potential to mitigate impacts through site specific policies which have been strengthened following the 2016 SA.

On housing, see paragraph 10.9.8 which indicates a need for some specialist housing and self built plots on strategic sites including Wisley.

A recommendation is included at paragraph 10.19.3 for the site specific policy for Wisley Airfield to ensure that impacts on the SNCI are minimised.

The SA for Wisley Airfield is detailed on page 122.

| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
**Comment ID:** pslp171/2746  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** 

<table>
<thead>
<tr>
<th>Policy/Section / page / para</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spatial Vision Page 19</td>
<td>The draft Vision should refer to ‘at least’ 13,860 dwellings.</td>
<td>(Page 21 and 22) An “at least” requirement has been added. However, the housing requirement has reduced to 12,426 by 2034 from 13,860 by 2033. Changes are also made to composition of housing, for example, requirements from urban areas have changed from “over 2,800” to “approximately 3,000” units. The housing requirements from Wisley New Settlement have also changed from “over 2000 homes” to “approximately 2000 homes”.</td>
<td>Welcome change to the reference to ‘at least’ and also ‘approximately’. No further comment on overall housing provision. All other objections withdrawn.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6448  **Respondent:** 9080065 / Shan Gregory-Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
I am writing to register my support for the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.

Living in Burpham, I have real concern for the impact of further traffic congestion with the development on Gosden Hill. Central Guildford is already often congested and a "bottle neck" during peak times. Solutions for transport issues remain unresolved.

Guildford is a gap town and expansion should be constrained to protect its character and the green belt as much as possible.

Other towns in this area are seeking to constrain their overall housing growth and I feel Guildford should be similarly cautious.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Housing requirements

The basis on which the housing requirements have been assessed appears to be flawed so that the requirement for 693 homes to be built per annum is overinflated. The council have failed to allow access to the demographic and economic models used so that proper checking has been impossible. The housing target needs to be constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am totally opposed to the development of our precious Greenbelt. It should not be viewed as a readily available source of land for development. We should certainly not be using up all the options in this local plan so as to exclude any future generations the ability to preserve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9824  Respondent: 9080737 / Andrea Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Brownfield sites

We need to reassess the brownfield sites we currently have and assess whether they are being appropriately used and whether there are more opportunities there that haven't been fully explored e.g. reconsider how the town centre should be redeveloped and include more housing and fewer shops.

I urge you to reconsider this plan to prevent the loss of the beautiful character of our wonderful town and prevent the loss of the greenbelt surrounding it. Once it's gone, it's gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1370  Respondent: 9081089 / William D Barker OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Brownfield sites

We need to reassess the brownfield sites we currently have and assess whether they are being appropriately used and whether there are more opportunities there that haven't been fully explored e.g. reconsider how the town centre should be redeveloped and include more housing and fewer shops.

I urge you to reconsider this plan to prevent the loss of the beautiful character of our wonderful town and prevent the loss of the greenbelt surrounding it. Once it's gone, it's gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to raising the annual number of houses built per year with no rational reason given. One must assume these are developers numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1371  **Respondent:** 9081089 / William D Barker OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ripley Village where I have lived for over twenty years will have this village swamped with houses and other surrounding villages similarly blighted, the countryside will have been pillaged and the greenbelt, only to be built on in exceptional circumstances, raped. I totally object to the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2452  **Respondent:** 9081089 / William D Barker OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites Garlicks Arch being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added without the consent of Highways England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5422  **Respondent:** 9081089 / William D Barker OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5424  Respondent: 9081089 / William D Barker OBE  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5423  Respondent: 9081089 / William D Barker OBE  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough. The NE has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic using through routes makes roads now gridlocked at rush hour.

I object to the methodology of drawing up the plan. Borough employs consultants who allegedly have planning expertise, but have done so without taking account of Surrey County Council highway planners' views, the costs involved of improving the infrastructure currently outweigh their financial capability.

The methodology is also flawed in my view, as this plan has been formulated without regard to Village Neighbourhood Plans. Surely logic would suggest planning is best formed by bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2710  Respondent: 9081089 / William D Barker OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan which will move public service bus network already considered inadequate for current needs, to one that will be unviable to run at all on account of the congestion the plan as proposed will accrue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/506  Respondent: 9081089 / William D Barker OBE  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to a plan which is fundamentally unsound and ill thought through which includes a site which its own planning committee rejected as unsuitable only then to have it put back again in its Local Plan. How can that be rational?

I object to sites being included almost as an afterthought viz Garlick Arch Ripley. This also proposes to access A3 North bound at Burnt Common disrupting an already congested A3 which is frequently gridlocked and at a standstill particularly in the rush hour. There is no provision in the plan to relieve current congestion of traffic in Ripley. It is a significant fact that there is more traffic flowing through the village now than there was when the case was made for the A3 to bypass the village.

I object to a plan that does not recognise the number of new houses already been and being created by the normal planning process, by discreet infilling and sensible use of space in cooperation and consent of Ripley Parish and residents. This Guildford Plan does not have this. I object to the number of houses proposed for the Ward of Lovelace as a whole which is not proportionate when the plan is viewed over the whole of the Borough. I object specifically to the totally unrealistic number of houses proposed in the ancient village of Ockham which is already prone to flooding and has an inadequate sewage system I object to the plan which will increase through traffic including HGV's on country lanes which connect villages in the Horsleys from current level of severe congestion, to one of a level which could only be called dangerous.
I object to the plan which will move public service bus network already considered inadequate for current needs, to one that will be unviable to run at all on account of the congestion the plan as proposed will accrue.
I object to the totally unrealistic number of houses proposed in areas which harm the AONB and SSSI, particularly the proximity of proposed housing to such sites and seemingly being unaware the havoc domestic animals, particularly cats, will have on ground nesting birds and other wildlife. The Plan allows for areas of beauty on the one hand and seeks to destroy it on the other.

For all these reasons and many others I argue the Plan is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/4341</th>
<th>Respondent: 9094497 / Janet Stiles</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1674  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  o failure to correct for errors in the historical data for international migration flows,
  o issues with the way it considers students and affordability and
  o flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3218  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3208  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7024</th>
<th>Respondent: 9094753 / D Jones</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</tbody>
</table>
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7061  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7067  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7004  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7011  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT to the location for new employment floorspace (Policy E2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
</tr>
<tr>
<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
</tr>
<tr>
<td>There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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| Comment ID: PSLPP16/7078  Respondent: 9094753 / D Jones  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT to the loss of rural employment (Policy E5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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</tbody>
</table>

| Comment ID: PSLPP16/7078  Respondent: 9094753 / D Jones  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7047  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/7051  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/7073  Respondent: 9094753 / D Jones  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7031  **Respondent:** 9094753 / D Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7037  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7042  Respondent: 9094753 / D Jones  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6992  Respondent: 9094753 / D Jones  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6998  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6981  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1069  **Respondent:** 9094753 / D Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1074  **Respondent:** 9094753 / D Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1078  Respondent: 9094753 / D Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The
draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all
Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost
certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There
is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control.
The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure
requirements placed on developers are supposed to be in place before development commences. This is utterly
unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash
flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher
levels of congestion than now. This will reduce the quality of life for residents through congestion and
disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride
facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF
provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as
a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan
consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market
Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford
until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow
with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for
Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC
and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy
Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under
Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and
Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>SQLP16/1082</th>
<th>Respondent:</th>
<th>9094753 / D Jones</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>Respondent:</th>
<th>9095713 / Melanie Richards</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the plan because having lived in East Horsley for 15 years, I know that the local infrastructure is overloaded already. Local schools are full, drainage is inadequate and medical services stretched to breaking point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14042  Respondent: 9095713 / Melanie Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Horsleys being removed from the Green Belt because the plan fails to demonstrate that the "exceptional circumstances" required have been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14044  Respondent: 9095713 / Melanie Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a suggested increase of housing in West Horsley of 35%.

Please do not carry forward a flawed plan which sees 593 new houses in the Horsleys within 5 years of adopting the plan. I recognise the borough needs new housing but new housing does not need to be put on the Green Belt. Please redevelop brown field sites and listen to village neighbourhood plans. These plans are written by the people who know the villages best and know where new housing could be included without ruining our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology used in formulating the plan which has not paid any attention to Village Neighbourhood plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan with regards to West and East Horsley. I object to the villages being removed from the Green Belt. The proposed increase of 35% more homes in West Horsley is unacceptable and will dramatically change the nature/character of the villages forever, as will the extension of the boundaries of the Settlement areas of the Horsleys. The density of the proposed developments will be significantly greater than any other single area in the Borough. The plans will impose an unsupportable burden on schools, roads, medical services, parking facilities and the trains/public transport. The villages would be swamped with extra cars and people using the shops, station and other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3475</th>
<th>Respondent: 9096129 / Jane Wilkes</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>

I object to the methodology used in formulating the plan which has not paid any attention to Village Neighbourhood plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the new Guildford Local Plan currently out for consultation. My objection relates to the plans in respect of East and West Horsley and is as follows:

- I do not believe that there are any exceptional circumstances which would warrant removing these 2 villages from the Green Belt;
- I do not believe that the village boundaries should be enlarged; and
- I am strongly opposed to the proposed 500+ new homes as the existing infrastructure is already overloaded and will not be able to cope with the additional demands that would arise eg schools, transport, doctor's surgery etc and furthermore this number of new homes is such a significant increase on the existing number that the character of the village would inevitably change for the worse.

I therefore strongly object to the proposals for West and East Horsley contained within the Proposed Submission Local Plan: Strategies and Sites June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/473  Respondent: 9096129 / Jane Wilkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed plan in relation to West Horsley specifically.

There are still an excessive number of new homes proposed within West and East Horsley without any plans for increased school places, medical and other community facilities and improvements to the basic infrastructure of the area ie roads etc.

I object strongly to East and West Horsley being taken out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3487  Respondent: 9096289 / John Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
<table>
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<th>Comment ID: PSLPP16/14567</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is not a full and valid consultation unless the methods by which the consultants arrived at the proposed housing numbers are explained to the public and therefore open to full scrutiny. There is a large increase in the housing numbers in comparison with the earlier plan in 2014, but we are not told the reasons for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Existing infrastructure is at full capacity and the draft plan does not explain how this will be upgraded and who will pay for it. Developers should be required to find the bulk of the costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Nearly 70% of the proposed housing is on greenbelt land, but the government’s national policy planning framework indicates that new housing does not constitute the very special circumstances which would justify this.

There is a mismatch between new economic development sites in the Borough and the proposed housing developments. For example a 35% increase is proposed for West Horsley.
The percentage increase in housing in West Horsley is higher that any where else in the Borough, but we are not told why and the densities proposed are much higher then those in the village now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3040  Respondent: 9096321 / G M Ccourt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the influx of thousands more families with school age children, when our local junior school, The Raleigh, is full and they want to move to a larger site now! If they took one of your sites and you took over their 2 sites, at least the planners would have a few hundred more houses and the school would be able to accommodate more new children, but only a few! Not the hundreds you propose to bring into our little villages.

We cannot accommodate these new children into the local Senior schools either. Where do you propose to build these new schools?

We are villages, people want to move here, as we did because of the quiet, the fields, the village atmosphere, and the safety of a village.

I OBJECT

there is no infrastructure which has been confirmed.

The flood plans in these areas get flooded every winter. West Horsley is known for being a flood plain area, totally unsuitable for hundreds more houses.

Thames Water has advised that the current wastewater network is unlikely to support the demand from all these developments!

I OBJECT

To the overcrowding at our shops, we have two little parades of shops for the use of the two villages, not thousands more people using them. There is only limited parking, only one little supermarket, Budgens, and no access to any larger Supermarket.

The train does not take us into Cobham centre, only Stoke D’Abernen, miles away from the Cobham town Centre, how do all these new people get to ships?

We have no bus which has a regular timetable to Cobham, our nearest town, there would have to be in place public transport regularly into Cobham and Guildford.

I OBJECT
To the state of our roads when thousands more people will be using them. The Drift, which is a narrow lane from West Horsley to Effingham, is already used by lorries, coaches from the schools, and many local businesses, it is full job potholes from constant use, how is that going to cope?

All our roads are narrow, we are a village, the drainage is already a problem through the village every winter.

BROWNFIELD ARE BEING IGNORED

We need more houses in the centre of towns, not out in our villages, therefore using more cars, more pollution, more congestion on our already crowded roads.

Recycle derelict and urban land.

I OBJECT
to the proposed planning of hundreds of houses in the West Horsley and East Horsley villages.

I wish to register objections to the local plan job 13,860 new proposed houses, as not sustainable.

There will be damage to local communities, these will not be villages any more.

We need to check unrestricted sprawl of large buildup areas, We need to protect our Green Belt land and fields.

We live here because it is a village and surrounded by green fields and farmland.

We like the village atmosphere, knowing our neighbours and meeting them in our villages, being part of a small community.

I OBJECT

To the huge influx of traffic this planning will cause.

Our little country roads cannot cope with the traffic as it is. The condition of our local roads is Appalling! Pot holes everywhere, causing dangerous driving, trying to avoid the holes, damaging cars.

We have narrow country roads, not suitable for hundreds more ‘large family cars’.

We don’t want yellow/white lines all over our village and road signs, which are quite unnecessary, which will only increase with your planning proposals.

I OBJECT

To the lack of facilities suitable for thousands more people using our Doctors Surgery.

We cannot get an appointment within a week as it is, there is nowhere to expand the Surgery, are you planning to build another?

The local hospital The Royal Surrey is overcrowded already, there is nowhere else for us in our villages fro go.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6126  Respondent: 9096321 / G Mccourt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the planning on the Wesley Airfield site

Again no infrastructure: Transport?

No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites.

These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters.

The Wisley site needs busses to take the population to Guildford, Cobham.

They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1329  Respondent: 9096993 / Kerry Harms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

· disregards an independent expert landscape study, which demonstrates that that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

· directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas

· ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

· adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Housing

The density of housing proposed is out of keeping for the East and West Horsley Village. This size of increase would dramatically change the character of where we live. New residential development needs to respect the Village character and be limited in size by the availability of local facilities and infrastructure. Not the other way round. West Horsley appears to have a huge 35% increase, compared to other areas – eg Ash/Tongham 16%? Also the impact of the proposed 2000 houses in Ockham/Wisley will ricochet into the Horsley facilities dramatically!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Village Facilities

West Horsley has only two small shops at the southern end of the village, with limited parking. People using East Horsley’s shops and Library have difficulty in parking at most times of the day. Any increase in the local population will make parking and movement in the village more difficult. It can definitely not be described as a “District Centre”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/3777  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Doctors**

The only Doctors Medical Practice serving all of West and East Horsley and areas beyond, is always very busy and residents have difficulty getting appointments as it is.

**Schooling** in the area is already full to capacity and in turn producing their own traffic congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3774  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Transport**

Traffic generated from the proposed housing would be considerable if you consider most households have 2 cars or more, plus cycles. Bus services are limited and only operate 2-3 times/day Monday to Friday. Horsley station has limited parking and at times is full on a weekday. An increase in village population will increase pressure on the station parking and traffic movement to and from the station. The access to the A3 in Ockham is already dangerous at peak times, with traffic joining the A3 from both Ripley and the Horsleys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3772  **Respondent:** 9097409 / Lindsey Fisher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference the Guildford Local Plan 2016 - The Horsleys, please see my comments below:

**Green Belt**

It appears that the proposals aim to remove West and East Horsley from the Green Belt which I strongly object to and I am still unclear what the “exceptional circumstances” required to make this change are? Once the Green Belt is gone, it’s gone for ever and the balance of the wildlife and vegetation will disappear. If you start to change any Green Belt it is open to abuse ongoing – it was created for a purpose and to protect the area for plans such as this! We are near the Surrey Hills AONB which encourages many visitors and events.

**Boundaries**

What are the ‘sound’ reasons for extending the boundaries of the Settlement areas of the Horsleys?

It seems unclear.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/3775</th>
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**Drainage**

There may be a serious under capacity of existing sewers and treatment works to cope with the large number of dwellings. We already had considerable flooding (involving sewage) earlier this year, both on the roads and the fields, with the water draining down from the fields after heavy rain. Where will it go if the fields are turned to housing?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield

Why aren’t more of the Brownfield Sites being used for housing before taking the Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/806  Respondent: 9097409 / Lindsey Fisher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

- I strongly object to no changes being proposed since the 2016 consultation regarding Insetting West and East Horsley from the Green Belt!

- Unacceptable that Guildford intends using Green Belt for housing. It appears that by 2034 Guildford will have grown by nearly 25%! Once the Green Belt is gone, it’s gone for ever and the balance of the wildlife and vegetation will disappear. If you start to change any Green Belt it is open to abuse ongoing – it was created for a purpose and to protect the area for plans such as this!

- Concerned that justification for the planned expansion may be inaccurate.

Development Sites

- I object to the fact that only 2 of the six original housing development sites in the Horsleys have been removed. There are too many new dwellings proposed on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2566  Respondent: 9098369 / Imogen Back  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I write to you with regard to the Proposed Local Plan, as along our house and land at 20 The Street form part of the site which makes up A37, a plot allocated for development.

I am in full support of the plan and the inclusion of our site (20 The Street) as I believe it is critical to the continuance of West Horsley and its unique character that we have housing available to encourage new young people and families to this beautiful part of Surrey.

By building on infill sites such as ours rather than allocating large areas of open fields this can be achieved with minimal effect on the environment and outlook of the village. In fact the site that we form part of will not even be seen from the road.

My husband has had early conversations with some developers and I know that their ideas are considerate and in keeping.

I should also make clear that 20 The Street can be developed individually or as part of the whole plot, including road access either through our land or via Bell and Colvill.

My husband and I are in a position such that we could and would like to move plans forward quickly in consultation with the Council planning in accordance with the Local Plan.

Therefore, with specific reference to the National Planning Policy Framework, we are flexible as to whether the site falls within the 6-10 year timescale for the wider site development, or it can be developed on a smaller scale as either just 20 The Street within the shorter timescales of 0-5 years.

In conclusion I fully support the plan and the inclusion of our site and if I can be of any further assistance please do not hesitate to contact me.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent:</th>
<th>9099297 / Anne Tilman</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not think that the Local Plan has been well thought out. Here is Horsley we need high quality homes for downsizers (not something suitable for a first time buyer). There are many long-term residents of Horsley who do not wish to move from the area but because of the lack of smaller properties with LARGE rooms choose to remain in their own large 4 or 5 bedroom properties. These should be providing the homes for the next generation.
Older people also want a small outside space and in this way the Beechcroft development is perfect although not all older people want to live in an over 55s estate. The area designated for new homes at the Thatchers would be a perfect location for high quality two bedroomed homes with large living areas and small gardens or courtyards.

I am therefore writing to object in the strongest terms to the local plan for Horsley.

I have lived in East Horsley for over 21 years and it is a lovely place to live and work.

I am in no doubt that if any of the proposals contained within the local plan are followed through then we will lose what makes the Horsleys a vibrant and complete community.

We are a village, and we act like a village and it is worth holding on to this.

Removal from Green Belt

What is the point of the Green Belt if it can be removed on a whim? What are the exceptional circumstances that have been demonstrated for this to apply. I would appreciate a response on this point.

Settlement Boundaries.

This decision too seemed to have no basis. There is scope to build additional houses within the boundary (in much lower numbers) and it is vital that we retain the Horsleys as a distinct village.

Infrastructure

There is no doubt that the infrastructure within the village cannot cope with the number of additional houses proposed. The parking at the station is full to overflowing, there is constant heavy traffic already on our narrow roads - particular problems on Ockham Road South and the drainage system fails every time we have a heavy shower. I do not have personal experience of local schools but I understand they are full and that medical facilities are stretched. We have quite a lot of older people in Horsley and they are a greater burden on the Health Service and deserve to be treated quickly.

Station Parade

The erroneous designation of Station Parade as a District Centre seems to have happened because somebody pressed the wrong button on their calculator. We have a collection of village shops - no more - and the village is not equipped to cope with the development proposed.

Villages at Ockham and Burnt Common

The impact of these proposed developments on our village would be enormous - extra traffic before and after complete and the demand for facilities within the village.

Concern over Housing numbers

It is hard to believe that there is sufficient demand within our area for so many houses. No one objects to "infill" but this is a major change in the shape of our village which seems to have been decided on against all the evidence. Is it true there is sufficient brown field land within Guildford to build a large proportion of these homes? I would appreciate a response to this.

I am concerned that some local businesses are being sacrificed in order to build houses that we do not need. Two local businesses are about to disappear as a result of the new Opera House (construction traffic is already a problem)

While most younger residents work in London there are many middle aged and older people who work locally. It is one of the joys of living in Horsley that friends and neighbours are truly part of the local community. It is important that we retain this balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a lifelong resident of West Horsley having been born and educated in the area, I wish to register my personal objection to the Proposed Submission Local Plan: Strategies and Sites June 2016.

The proposal is for far too many homes for a village that is already at the limits of a sustainable infrastructure. The schools in West Horsley were full when I went there some years ago with road access for cars being difficult and public transport being inadequate.

The possibility that part of West Horsley could be removed from the Green Belt by using the now known to be incorrect Green Belt and Countryside Study is wholly inappropriate and I object to this as being totally unnecessary.

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching...
from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London
- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  4. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  1. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Pl The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water,NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/611  Respondent: 9102145 / Mary Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A41/Policy A40/Policy A38 and Policy A37

The Local Plan has suggested a 35% increase in housing for West Horsley by 2022 and only 11% for Guildford Town. Why is this? The village has no shops, no post office, no petrol station, no train station, no medical centre and a very limited bus service. It also offers no employment opportunities for residents. The National Planning Policy Framework requires that new residential development must be limited in quantity by the availability of infrastructure and local facilities – this policy has been ignored in the Local Plan.

The density of houses on the proposed sites is completely out of keeping with the rest of the village and will change the character of the village forever. The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area – this policy has been ignored in the Local Plan.

Removing West Horsley from the Green Belt

What is the exceptional circumstance for removing the village from the green belt as required under government guidelines? It cannot be justified on the basis of unfulfilled housing. There is no explanation as to why West Horsley has been chosen to be removed and no justification for doing so. The Local Plan states the “we will continue to protect the Metropolitan Green Belt” yet the Local Plan is taking West Horsley out of the Green Belt. West Horsley is a distinctive rural village and its green belt status is essential to ensuring the character of the village remains.

Please take my objections seriously and reconsider your plans for West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/920  Respondent: 9102145 / Mary Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the Local Plan proposals for West Horsley on the following grounds:

**Policy A41**

The Local Plan has included this new site with a proposal to build 90 homes on the open fields (green belt land) of West Horsley (Policy A41).

This new site will totally destroy the character of West Horsley. West Horsley is a rural village and one of its main features is that on the entry roads to the village (mainly Long Reach in this instance) there is a vista across fields as there is only development on one side of the road. These fields do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill at all. I cannot understand why this piece of land would have been picked for development at all as it does not satisfy any of the criteria for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 9102209 / C Dawson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Guildford Borough Council – Proposed Submission Local Plan

As a long time resident of West Horsley and earlier of Ockham, I write to Object to the proposals set out in the above proposed local plan as they affect The Horsleys, Ripley, Send and Ockham.

I strongly object to the proposed removal of West and East Horsley from the green belt. The villages are well into the green Belt, are not adjacent to any non green belt urban areas and it would be incongruous to have Areas of Outstanding Natural Beauty (AONB) within or adjacent to urban areas.

I strongly object to the proposal to add 385 new homes within the parish of West Horsley and further I object to the proposal to build 100 homes in East Horsley close to the railway near to East Horsley Station, but adjacent to parts of West Horsley.

I object to the proposals on the grounds that the villages do not have the infrastructure to service the homes proposed; that is insufficient water, electricity, gas and sewerage. In addition there is no provision for extra school places, at all levels the schools are over subscribed, nor plans to expand medical provision. The current road network is based on roads which remain country lanes, founded in the days of horse and cart, are narrow, without safe pedestrian footpaths and because of the increasing heavy use are even now breaking up.

If Guildford Borough Planning department was of a mind to develop and plan the development of the borough and region in a meaningful and positive way it would start with planning improvements and expansion of the infra structure. If the planning department was a business it would fail as it has not thought through or planned for the development it is proposing. The way it is going about the plan will lead to the Borough trying to develop without sufficient income to service the plans. The proposals do not demand that developers contribute meaningful sums to the infrastructure development. Crazy!
I object to the plan as the housing density proposed is much higher than anywhere in the parishes and while the parishes do not need more large 4-5 bed houses, but smaller 2-3, particularly 2 bed maisonettes, and terraced houses so that younger people can live in the area, with green space between the blocks to maintain the garden feel of the parishes. In some locations, perhaps near railway embankments 4-5 floored blocks of flats of interesting design could be built.

It is time that Guildford Borough acknowledged that a good part of the housing need could be met by the development of high rise buildings in the centre of Guildford, such as the railway redevelopment proposals. Other areas are also suitable. As towns develop into cities their centres go up. Centres of the Guildford suburbs could also rise higher to perhaps 5/6 storeys.

I object to the plan as Guildford Borough Council has not demonstrated joined up policies for car parking, access to shopping areas, development of local shopping opportunities rather than their reduction. There has to be access to shops and parking and parking availability to increase footfall. This is necessary while transport locally is geared to the motor car. Busses are like trains they cannot go everywhere so many people will not use them and then they are uneconomic.

I object to the proposed plan for its impact on the green belt and in particular on the Surrey Hills ANOB, which abuts and is part of the parishes of East and West Horsley.

I also object to the plan as there is no or little indication of where the new residents will likely find employment to enable them to live in the new houses planned. The Railways are already at capacity as are the local trunk roads and there is no surplus parking space at any of the local railway stations. As we are likely to continue to use the motorcar for personal transport and with buses rather like trains in that they only travel on limited routes the current plans will increase pollution in the atmosphere and increase Global Warming.

These local plan proposals have not been well thought out and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
new houses, I can not imagine what reason could there be? It is obviously a hidden agenda to permit further building in these areas at a later date without having to obtain separate approval in the future.

I should also like to state that the extent and number of new houses proposed in the Horsley’s area is totally out of proportion to any local requirement, there is no industry or business case for increased housing on this scale which I think is about 40% increase in West Horsley if new housing is required it would be better to site it close to where that need really is.

The vast number of new residents commuting in and out of the area would put a massive additional burden on the existing road networks and transport infrastructure that is already buckling under the weight of lack of investment or maintenance by Guildford County Council – Have you tried driving down ‘Long Reach’, ‘Ripley Lane’, ‘The Street’, ‘East lane’ in winter? When flooded and is waisting on the sides.

Where are do the new residents on the proposed of houses are taking the children to school? It would put an unsustainable strain on the local schools. When we moved to this area 12 years ago we struggle getting our son into the local Primary School and there are annual arguments over catchment areas between the local villages just to get children into the nearest Secondary Schools. The proposals do not address these problems adequately they would just make them worse and mean parents would have to drive their children to schools many miles away. What about hospital and Dr surgery?

The increase in housing will also strain the services infrastructure, local sewage and drainage requirements are overloaded as can be seen after a heavy downpour water floods over Ripley Lane and The Street between the Railway Bridge and Long Reach due to many natural springs in the area. Localised flooding will of course be compounded by the proposed new homes the plans take no account of this.

A couple of years ago heavy construction lorries were employed at Jury Farm for a couple of months in Ripley Lane and the Road was structurally damaged as a consequence and has still not been satisfactorily repaired. Building in the local area on the scale proposed will never be made good by the construction companies lining up to build on nice Green Field Sites.

I note that in the latest version of the local plan that the Station Parade in East Horsley has been designated a District Centre which is incorrectly identifying the village facilities in order to justify inappropriate development of the area.

I urge the Council to-

a) Think again on a local scale and consider what is actually needed by the people living in the borough.

b) Go back to Central Government and seriously question the whole premise of this notional housing requirement. Do we really need so many houses in such a small area? when it will only compound the pressure on local facilities and have a major negative impact on the local environment, adversely affecting the quality of life of all those currently living around Guildford

I am sure that there is plenty of room for new housing and properties that could be refurbished in other parts of the country, without the impact to sensitive environmental and designated Green Belt or conservation areas where effort should be put to regenerate both jobs and industry supported by investment in affordable housing.

I really hope you take us serious and try to find a solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I was born in, and have lived in, Surrey for all my 67 years; the last 25 years being in West Horsley. I have lived long enough to have experienced much development and increased urbanization but I have never felt so concerned, and I would go far as to say even threatened, by the proposals in the Local Plan. The Green Belt was created for very good reasons which are still valid today.

I believe that the Government's housing pressures do not justify reducing the Green Belt any further and certainly not to the extent contemplated by the Local Plan especially in West Horsley. It's not just a question of allowing new houses on greenfield land but also whether the local infrastructure and amenities would be able to cope without destroying the whole character of the villages concerned. Once an area has been changed for the worse by erosion of the Green Belt it can't be changed back.

Surely there must be other areas outside the Green Belt that can be used to satisfy the Government's housing needs without burdening the local villages and their infrastructure. Shouldn't the Council be prioritizing the protection of the Green Belt and the interests of the existing residents who want it maintained?

*The local roads will simply not be able to cope with the increased traffic especially in the rush hours when there are already considerable traffic jams caused by commuters and parents taking their children to and from school. Ockham Road North and South and The Street/ East Lane would be totally inadequate to deal with the extra traffic.*

*The car parking at Horsley Station and in the main shopping parade in East Horsley (that also serves West Horsley and Ockham) is barely adequate for the existing residents and could not cope with additional cars thus resulting in parking chaos.*

*The Horsley Health Centre is already under considerable strain.*

- Where would all these new residents work? There are not enough job opportunities locally. Therefore, most of them would be using the A3 or Horsley Station. The A3 is already a nightmare in the rush hours and as mentioned there would be no parking available at the Station even if they could get through the traffic jams to get there. I am talking about an appalling congestion situation here.

- Where would all the additional children go to school? At present there is less than adequate provision of school places for the local children who are in competition with children from outside the area for the places available. We need extra provision at all levels of the children's education, nursery, infant, junior and senior schools not just an extension of the Howard of Effingham school which caters for senior pupils only.
*The water and sewage drains are already in a poor state and would not be able to cope with the additional demands on them.

*Housing needs in this area have not yet been proven and certainly not to the extent to warrant a major intrusion of this scale on the Green Belt.

*I must also mention the proposed Wisley Airfield Development. Most of those residents will also use the A3 or Horsley or Effingham stations causing further congestion, air pollution and damage to the environment.

In conclusion I am appalled that the Council should even be considering a major increase of the population levels in villages like West Horsley, Bookham, Ockham and Effingham and the development of Wisley Airfield which alone will have a tremendous knock on effect on these villages particularly Ockham and East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>9227073 / St. Martha Parish Council (Anne Tait)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Tillingbourne Valley with its string of villages is a geographical gem in its own right. It is located within the Surrey Hills AONB and within an AGLV. The scenic quality of this sensitive rural landscape and the need for it to be protected has been recognised since 1958. This is reinforced by the fact that the whole of the Surrey Hills AONB falls within the Metropolitan Green Belt. This has the strategic role of checking development sprawl, safeguarding the countryside from encroachment, and providing areas where outdoor recreational activities can take place and wildlife habitats be maintained. The views from the valley at Chilworth are spectacular, with the Chantiers and St.Marta’s hill to the North, and the wooded high ground of Albury heath and Blackheath to the South.

Chilworth is an ancient settlement with a fascinating history centred around the delightful Tillingbourne, which was the source for water-powered mills from Abinger Hammer to Shalford. These produced gunpowder, paper and wire over many centuries. The Surrey Hills AONB Board has received HLF funding to study the Tillingbourne Valley which has a largely forgotten but Nationally significant landscape heritage. The village communities in the valley are researching and recording an amazing history which will enhance the attraction of the Surrey Hills AONB to a wider public.

It is therefore vital that the heritage villages in the Tillingbourne Valley continue as discrete entities which are not allowed to coalesce through linear development. It is essential that all the villages including Chilworth remain within the Green Belt so that inappropriate development is prevented and the openness of the countryside is protected with its views to and from the AONB. Hence the Parish Council are very strongly opposed to taking the village of Chilworth out of the Green Belt.

Another major concern is the possible use of land at Old Manor Farm (Site reference 2286) for 20 new dwellings. This is Green Belt land in an AGLV, adjacent to a Conservation Area and outside the Settlement Boundary. The access to this site
is by a very narrow, single track, un-made up, un-adopted lane, totally unsuited for additional traffic. There are no other access routes to the site. This would be an entirely inappropriate development. The land should remain open and within Chilworth’s Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4228  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to several points in the proposed Guildford Local Plan

I have lived in East Horsley for 7 years and first moved to this area of Surrey in 1969 as a child. I feel I have a VERY good understanding of the impact and consequences of this proposed development. I do support the need for some development and acknowledge the need for new housing in the area. However, there are several key issues with many of the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7839  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Inclusion of the Wisley Airfield and the 2000 plus homes etc

Despite being unanimously rejected earlier this spring, this proposal has reappeared. WHY? With what justification? The following issues simply have not been addressed since it was turned down. Why then include it?

Impact on the Local Area

* The additional 5000 residents is the equivalent of doubling the populations of both Horsleys.

* The density is out of keeping with the local area and will change its nature forever.
The impact on light pollution, traffic and infrastructure has been GRAVELY UNDERESTIMATED and proposed mitigation measures are totally inadequate. The developers are completely arrogant in their estimation of the following:

1. Everyone in the development will commute by train from Woking or drive on the A3. Why? Have you ever tried to drive from Ockham to Woking during the morning commute and/or park? It will take 25 minutes at a minimum and create huge congestion in Ripley, Byfleet and Woking.

Why will they not then not go to East Horsley or Effingham which are less than 5 or 3 minutes drive from the proposed development? Of course that is where they will go - the developers do not want to state this as the implications are not favourable to them.

*Have you been to visit these train stations?* There is NO SPACE at East Horsley for additional parking expansion and to do so in Effingham will mean confiscation of land and a further impact on the Green Belt.

This issue also reflects the FACTUAL ERRORS in the documentation that state there are 9 stations within 5 miles. In fact this is only as the crow flies not as Surrey roads exist. **ONLY EFFINGHAM AND EAST HORSLEY ARE WITHIN 5 MILES by usable road of this development.**

The fact that the developers are already planning that a new double mini roundabout to be installed at the junction of Forrest Road and Effingham Common Road indicates that they themselves know the residents will go to this station but are unwilling to acknowledge it as it does not help their case.

1. The developers claim no impact on Cobham/Downside as everyone will do their local shopping in the new shop(s). REALLY? 2000+ homes from a convenience store? There is a small mini budgens in East Horsley and one convenience store in Ripley. These 2000+ homes will be shopping at the Sainsbury’s and Waitrose in Cobham and use all the other local facilities there (banks, opticians, dentists etc). They are simply not going to drive to Merrow or Guildford to do their local shop and there is only a very small car park in East Horsley which offers limited facilities in terms of shopping. This will severely strain traffic and resources in Cobham/Downside. Yet there has been no consultation with Elmbridge.

1. Lack of Local secondary schools. It is very nice they want to add a primary school but where are these kids going to go afterwards - and who is going to fund this school in the longterm? As the Headmaster of Howard of Effingham has stated - that even if it is expanded, there will be no places for children from this development. As it is East and West Horsley residents find it nearly impossible to get into the Howard. There is a severe shortage of secondary places throughout this area and absolutely no plans for a new school. Are they assuming everyone will go private? **Again the lack of consultation with other districts over this issue (Mole Valley, Elmbridge, Woking) is unbelievable.**

1. All of this additional traffic will have a huge and non reversible impact on the historic houses and other buildings in Ockham, Ripley, Downside and the Horsleys.

1. The short term closure (5 years!) of a number of roads will have a huge impact on EVERYONE who lives in the Horsleys, Ockham, Ripley, Downside etc.

*Flooding has not been adequately assessed. No study has been done of the impact on the water table and flooding in the area. This could have a huge impact and also affect the RHS at Wisley.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7840</th>
<th>Respondent:</th>
<th>9228769 / Cathryn Fleming</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inclusion of the Wisley Airfield and the 2000 plus homes etc

• All sites that are dependent on the use of the private motor cars cannot be considered sustainable.
• The proposed public transport provision is unrealistic given the nature of the roads in question and the level of congestion in the neighbourhood. Moreover given cutbacks by Surrey Council for budget constraints should not be planned upon.
• The thought that residents will walk or cycle to the train stations on narrow, unlit country lanes that do not have pavements is beyond ridiculous.
• Parking, as stated above, at the two nearest stations is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7841  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inclusion of the Wisley Airfield and the 2000 plus homes etc

• A number of factual errors exist in the documentation - i.e. that Natural England has not agreed to SANG provision.
• The misrepresentation stated above with respect to train stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7842  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Inclusion of the Wisley Airfield and the 2000 plus homes etc

- The housing need in Guildford has not been determined
- No consultation with surrounding boroughs who are also objecting
- The site is not deliverable within 5 years due to problems with sewage and water capacity as outlined by THAMES Water and the OCK DVOR air traffic control beacon situated onsite which limits development and which is still operating
- No very special or exceptional circumstances exist
- There are alternative ways to increase housing by using infill sites in the area
- The proposal includes the site safeguarded for waste under the Surrey Waste Plan which Surrey County Council refused to give up in their response to the Draft Local Plan in September
- The site is not listed for development under the existing 2003 Local Plan.
- There is not enough land to provide a sustainable community based on your own (GBC's) parameters
- Surrey Police have concerns on their ability to manage the proposed population density

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Attached documents:

#### Comment ID: PSLPS16/7843  Respondent: 9228769 / Cathryn Fleming  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

#### Thatchers Hotel ReDevelopment

Two issues here. There is no other local hotel accommodation unless you go further south to Guildford or to Leatherhead/ Cobham as the adjoining DeVere is NOT open to the general public. With the approval of the Opera House at West Horsley Place, removing our one hotel accommodation seems a remarkably stupid move, loosing local jobs and business. Plus the hotel is very full many nights. Secondly I live opposite the hotel and can attest that the A246 is a very busy road coming into the turn at that corner. With an additional 100 odd cars going in and out at the junction without the imposition of a roundabout or traffic lights, there will be huge accidents and no matter what increase congestion for which there has been no plan. Plus as the first planning application showed, such a development will negatively impact on Horsley Towers.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Attached documents:

#### Comment ID: PSLPP16/17264  Respondent: 9228769 / Cathryn Fleming  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Horsley Station Parade has been designated a District Centre

The attempt to classify the small station parade as a district centre is beyond laughable. It meets virtually none of the requirements. It is not a district centre. There is only one small convenience store and a pharmacy and post office plus charity shops and a cafe. This is not the definition. It indicates that no one from the group that prepared this plans has remotely interviewed or even visited. If you live in the Horsleys, the "district centre" is effectively Cobham (ELMBRIDGE) or Leatherhead (MOLE VALLEY). There is nothing in Station Parade to make it this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17265  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Horsley Infrastructure is Overloaded.

The proposed addition of 593 new houses in the Horsleys excluding the Wisley airfield is not accompanied with a plan to improve the additional infrastructure. The medical facilities are stretched - even to get an emergency appointment right now takes over a week! The primary school is full and there is no secondary school in the Horsleys with children being sent miles away as all the local schools (Howard of Effingham etc are way oversubscribed). It sorely looks like they assume everyone buying these houses will send their kids to private school and have private GPs, which is absolutely not the case. Roads and parks are overloaded and crowded etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17261  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Inclusion of the Wisley Airfield and the 2000 plus homes etc

- This is a HUGE encroachment of the Metropolitan Green Belt
- The proposal is an inappropriate development in the Green Belt as defined by the NPPF paras 88 and 89
- The site is clearly visible from the Surrey Hill AONB and it will therefore have a negative impact on views to and from AONB
- Development of this site will result in harm to the rural landscape, the character of the area and the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17263</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Proposal to Remove Horsleys from the Green Belt

The exceptional circumstances that are required to remove a village from the Green Belt HAVE NOT BEEN DEMONSTRATED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/17262</th>
<th>Respondent: 9228769 / Cathryn Fleming</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Inclusion of the Wisley Airfield and the 2000 plus homes etc

- The impact of 2100 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species in contravention of the EU Birds Directives & Habitats Regulations.
- The siting of the proposed Suitable Alternative Natural Green Space adjacent to the SPA will only increase visitor numbers causing further damage to the protected area.
Para 119 of the NPPF "presumption in favour of sustainable development" does not apply where development requires assessment under the Birds or Habitat Directives and this fact has been TOTALLY ignored by the Applicant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17266  Respondent: 9228769 / Cathryn Fleming  Agent: 9228769 / Cathryn Fleming

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing Numbers

While I appreciate the need for additional housing in the borough, I fail to see why the Horsleys should have a population increase that is almost 70% higher than the population estimate increase for the rest of the borough. It is clear that the council have decided to put homes here and NOT spread them across the rest of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2968  Respondent: 9237953 / Patricia Wood  Agent: 9237953 / Patricia Wood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that the Borough Council is using arbitrary figures, produced by G. L. Hearn, who used an undisclosed formula, to propose building nearly 14,000 houses in the Borough. The Borough of Guildford does not NEED this number of houses and we, the current residents, do not WANT them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6051  Respondent: 9237953 / Patricia Wood  Agent: 9237953 / Patricia Wood
I object to the proposal to build on the former Wisley Airfield site. This has very recently been unanimously turned down by the Borough Council on 14 different counts and should be removed from the Local Plan permanently.

My specific objections to the Former Wisley Airfield development are as follows:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this
situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/12375</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed density of houses, which is much too high and not in keeping with the areas for which they are proposed. You have no right to change the character of villages such as East and West Horsley, Ockham and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12376</th>
<th>Respondent: 9237953 / Patricia Wood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that there is no provision for additional doctors’ and dentists’ surgeries to cater for the needs of an increased population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12377</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in traffic, (at least 25,000 vehicles,) that the Proposed Plan will incur. Gridlock will prevail in many locations, e.g. A3/Wisley interchange, the A3/M25, and also the A246/Ockham Road South, not to mention the A3 around Guildford itself. Our local roads in the Horsleys, and Ockham are narrow, winding lanes and will become very dangerous with greatly increased traffic, putting the many cyclists at risk. There are already unavoidable “pinch points”, such as in Ockham Road South, where vehicles find it difficult to pass a bus, lorry or even large van.

I object to the air quality in the area being further polluted by the increased traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/12378</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the loss of natural habitat for our local flora and fauna, which the Proposed Local Plan would impose</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to ANY of our villages being taken out of the Green Belt. Former Conservative Governments created the Green Belt, to provide a “Lung for London” and to prevent the urban sprawl that this Local Plan is proposing.</td>
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I object that with more roads and houses, there will be greater run-off of surface water and flooding problems will become worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to OBJECT in the strongest terms possible to the amended Local Plan and to endorse fully the comments made by the East Horsley Parish Council, with particular regard to taking any land out of the Green Belt. This is not in the remit of the Borough Council. It is against ministerial guidance and inspectorate decisions and does not meet the “very special circumstances” required.

I strongly OBJECT to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2. This land is very close to Surrey Hills ANOB. Chalk Lane is an ancient sunken lane, with high chalk banks, and joins the A246 where there is a very dangerous bend. Any development in this area would have serious repercussions on the area and destroy its character.

I OBJECT to the number of new houses proposed in the Local Plan. The total number to be built has been slightly lowered from the original plan but by nothing like enough. The density of the proposed house building in East and West Horsley and other villages is totally unrealistic and unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the number of new houses proposed in the Local Plan. The total number to be built has been slightly lowered from the original plan but by nothing like enough. The density of the proposed house building in East and West Horsley and other villages is totally unrealistic and unacceptable.
I also OBJECT to the inclusion of the Three Farms Meadows proposal in the plan, for all the reasons I gave in my last letter. The changes that the developers have since proposed do not alter the case against the development in any way. Why is this site still included, when another, more suitable, has been removed? The local infrastructure cannot support this development, the roads are already very congested, the M25 Junction 10 is already a daily major problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4046  Respondent: 9237953 / Patricia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also strongly OBJECT to Site Policy A39, land near Horsley railway station. The present Green Belt boundary line is defined by a deep drainage ditch, which is classified by the Environment Agency as a ‘river line’. Much of the land there is classified as Flood Zone 3 and so not appropriate for development. The site is also very close to to an important SNCI.

Please listen to the residents of the borough and do not completely wreck this beautiful area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1784  Respondent: 9241793 / Nicky Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/1783  Respondent: 9241793 / Nicky Wilson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1780  Respondent: 9241793 / Nicky Wilson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

- The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon, the villages will become a conurbation. Traffic congestion will increase through the villages and reduce the quality of life of villagers that have chosen to live in a green belt area.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

- The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
- The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.
- Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, (site allocation A25) [than the Burnt Common site did].

2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs.
   - The inclusion of site A58 Burt Common, removes the need for A43 Garlick's Arch.

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were...

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/514  Respondent: 9241793 / Nicky Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit Î£ to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/516  Respondent: 9241793 / Nicky Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
HOUSING NUMBERS

Considering the proposed increase in housing numbers in East and West Horsley, this represents a disproportionately greater percentage to the existing housing stock than the remainder of the borough.

Additionally, it appears that the infrastructure for additional medical facilities, school places, parking, public transport, surface water and sewage disposal have not been fully taken into account.

If the Local Plan is to be taken seriously, all facilities relating to the local infrastructure have to be taken into consideration at the consultation stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A35 / Land at former Three Farms Meadows, Ockham

I object to this policy.

A chorus of public outcry resulted in Guildford Planning Committee, in April 2016, unanimously rejecting a planning application for this development on 14 separate counts.

Following this rejection, many residents believed that this application was on 'hold' until the developers reassessed their proposals. Evidently, the electorate where mistaken as GBC have again, inserted this proposal into the draft Local Plan.

Owing to the concrete runaway, the site is being misrepresented as brownfield, when in fact, only a small area of the overall site where the hangers were previously situated, is actually brownfield. The majority of the site area is currently designated as Green Belt and should remain as such.

Again, under section 9/87 of the NPPF, this proposal does not demonstrate 'exceptional circumstances.'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the 2016 Local Plan consultation document on a number of counts.

GREEN BELT

The Green Belt is a precious and important commodity that is not to be exploited. Its fundamental aim is “to prevent urban sprawl by keeping land permanently open.” Additionally, it preserves and improves air quality and helps prevent flooding. We should protect and conserve it. There are five legally defined objectives for the Green Belt that are accepted by the national government and our local MP (Sir Paul Beresford). Even the Guildford Conservative election manifesto pledged to protect the Green Belt.

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

I object to the removal of East and West Horsley (and 13 other villages) from the Green Belt, under the definition of ‘insetting.’ It is little consolation to suggest that GBC will off-set the removal of these villages by adding to the Green Belt in and around Ash and Tongham, conveniently, around the GBC leader’s ward. This is nothing more than a blatant vote rigging scam.

Section 9/87 of the NPPF states:  *As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*

Unmet housing need is NOT an exceptional circumstance in law. GBC has not demonstrated any exceptional circumstances. Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to write in support of the draft local plan which is currently in the public domain for consultation.

Guildford has some difficult requirements. As is well known through the borough, housing is in short supply and therefore very high cost - prohibitively high for many. We do of course have much beautiful green open space which would be wonderful to protect completely. However, as the plan shows, we need to take a pragmatic approach to balancing the needs of all and taking small sacrifices in the green belt to achieve this.

I hope that after many hours of discussion and review we can finally get a local plan approved, submitted and accepted. Whilst we spend so much time talking about what Guildford needs, we are sadly falling behind neighbouring boroughs and not doing our wonderful town justice. I urge the council to push ahead with this plan, there will never be a plan that is universally accepted. If we try and wait for that, our town will quickly become irrelevant. For a great town like Guildford, this is my biggest fear.

I, like many others I know, want to start my family in this town and allow them to appreciate all the wonderful benefits it has to offer. Please take Guildford out of limbo and allow us to maximise it's potential.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3187  Respondent: 9243073 / John Hartley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sir or Madam, I wish to comment on the proposed local plan. I feel the new housing target of over 690 new houses per year is no longer realistic, post the Brexit vote & the downward pressure caused by a reduction in immigration. There is also likely to be a house price correction, so it would be crazy to build large housing estates where the developers go bankrupt halfway through construction (as happened in Spain).

A more realistic target, is just to build for local need. That would be in the region of 300 houses per year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13160  Respondent: 9243073 / John Hartley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Large greenbelt schemes should be avoided. There is not the infrastructure to cope. The “war on the motorist” means there has been no substantial road building for the last twenty years. Ripley High Street is blocked at rush hour now, so it cannot cope with additional traffic from Garlick’s Arch or Wisley airfield/Three Meadows.

We need new dual carriageways. A Southern bypass for Guildford (A31 to A25). The Hindhead tunnel shows how this could be done. Plus the Woking Eastern Approach Road (WEAR) needs to be resurrected.

Promoting walking/cycling is good, but remember, we have an ageing population who will need to drive & park. You need to increase short stay parking near shops/doctor’s surgeries & more disabled parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/448  Respondent: 9244641 / Peter Cordrey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Local Proposed Plan and inclusion of plan of Former Wisley Airfield, now known as Three Farms Meadows (TFW)

I have lived in Ockham for over 34 years and am very concerned and object to the inclusion of the TFM. My objections are on the following basis:

1. The GBC planning Committee unanimously rejected the planning application this year.
2. The land is to be protected by the green Belt policy.
3. The village suffers very badly with water flooding and the new proposed houses will make this even potentially worse.
4. The development will increase traffic in the village and A3 to a level that will cause potential grid lock and increased accidents.
5. The village does not have sufficient infra structure to support the new houses and traffic. Including railway parking that is currently at full capacity at Effingham junction station.
6. The proposal has blighted the village and marketability of existing homes.
7. The development will have adverse consequences and health and safety concerns with pollution including increased unacceptable noise levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/41  Respondent: 9245313 / David Murray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham
I am responding to the local development plan, with particular focus on Ash and Tongham. You plan to build 2000 dwellings, most on previously rural land, causing an increase of about a third in the population of this settlement. This is too much for the settlement to accommodate and will impair the quality of life of those already living there.

Your infrastructure plans are mostly vague aspirations, uncosted and undated, despite the fact that building work has already commenced on several hundred homes.

1. Primary education.
   You state that 1-2 extra forms of entry will be needed, most likely at Ash Grange school as it is nearest to the bulk if the new development. As FOEs have to be whole numbers, this means turning a 1 FOE school to a 3 FOE school. Has the feasibility and cost of this been seriously considered? What consultations have taken place? Who will pay? This is a matter of some urgency as the classrooms have to be built and staffed before the first children arrive, which will be within the next 3 years. I would also mention potential difficulties with parent parking, already a problem in the area near the school. If instead you added one of the FOEs to the Walsh school, you would have the same issues at that school.

2. NHS General practices.
   Your (almost illegible) map of GPs in the borough shows none in the western part of the borough, despite the existence of a large practice in Ash Vale (the only one in the area). Can this practice deal with a 30% increase in patients? Will they use the land offered in the Ash Lodge Drive development? How much will it cost? Who will pay? The Ash Vale practice has poor access, with very limited parking, and is not on a bus route. It is also too far from the proposed new developments for people to walk.

5. Sustainability
   Ash scores highly on sustainability because it has the necessary community infrastructure for its current population, but this infrastructure is at full capacity, so will need significant investment to deal with the large number of extra homes. The sustainability score should reflect this. Where is the funding for all this infrastructure work?

The policy of Guildford Council towards development in Ash and Tongham is developer-led, not community-led. The developers can gobble up the green fields without having any responsibility for the impact on the community. The Council are playing catch-up with vague and unfunded plans. Given that development on several hundred houses has already started, the council need to get its act together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Transport

The sites in the eastern part of Ash, that are currently rural, are partly serviced by narrow roads without pavements (Foreman Road and Harpers Road), and unsuitable for pedestrian use. The proposed road schemes in the area are unfunded and undated, so may never happen, and do not address the congestion in the narrow section of Ash Street between the Greyhound and the Coop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/178  Respondent: 9245313 / David Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Primary education.

You state that 1-2 extra forms of entry will be needed, most likely at Ash Grange school as it is nearest to the bulk if the new development. As FOEs have to be whole numbers, this means turning a 1 FOE school to a 3 FOE school. Has the feasibility and cost of this been seriously considered? What consultations have taken place? Who will pay? This is a matter of some urgency as the classrooms have to be built and staffed before the first children arrive, which will be within the next 3 years. I would also mention potential difficulties with parent parking, already a problem in the area near the school. If instead you added one of the FOEs to the Walsh school, you would have the same issues at that school.

2. NHS General practices.

Your (almost illegible) map of GPs in the borough shows none in the western part of the borough, despite the existence of a large practice in Ash Vale (the only one in the area). Can this practice deal with a 30% increase in patients? Will they use the land offered in the Ash Lodge Drive development? How much will it cost? Who will pay? The Ash Vale practice has poor access, with very limited parking, and is not on a bus route. It is also too far from the proposed new developments for people to walk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/168  Respondent: 9245313 / David Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Several of the proposed development areas are shown as at flood risk on your flood hotspot map, yet there is no project to deal with this, only the use of balancing ponds within each site. Will this approach cope with the less frequent but heavier rainfall predicted due to climate change?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 9247745 / Keir Barrie</th>
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| We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:  
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty  
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt  
- increase tail backs on the A31 and traffic congestion  
- result in rat-running through local roads  
- add to Guildford's pollution.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

Attached documents:

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| As for the increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, will have a significant impact on the already highly congested local rural road network around and within Ripley, where we live.  

Please think again and do not spoil our Greenbelt.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
### Comment ID: SQLP16/108  **Respondent:** 9250945 / Peter Tuevey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I logged in to find out what was happening. I quickly found an introductory video with the heading: Find out what the draft Local Plan means to some local people by watching the video below I watched it. Most of the "local people" were Council employees with an axe to grind. I call that misrepresentation!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: SQLP16/435  **Respondent:** 9293121 / Charlotte Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

It seems to me that The Strategic Housing Market Assessment has grossly overestimated the need and I do not feel that sufficient consideration has been given to infrastructure, particularly regarding traffic, to support such huge development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: SQLP16/436  **Respondent:** 9293121 / Charlotte Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

As I understand it, the main aims of green belt land are:

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I feel that the plan completely disregards all five purposes set out by the government’s National Planning Policy Framework. Whilst I understand there are exceptional circumstances that would make developing green belt land viable, having read both the policy framework and GBC’s Green Belt & Countryside Study, I cannot feel there is enough evidence to make this such an exceptional circumstance to justify potentially destroying an area of outstanding natural beauty. Where does it stop? Green belt is meant to be green belt permanently, which is why on the other side of the coin, 'New Green Belts should only be established in exceptional circumstances'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6033  Respondent: 9296321 / Emma Nottingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the GBC draft local plan proposal to build 1,800 houses, industrial park and highway on the slopes of the Hogs Back at Blackwell Farm. I object to this development on the following grounds:

1. Destroy views from the Hogs Back ridge which has Area of Outstanding Natural Beauty status
2. Remove 72 hectares of scenic farmland and ancient woodland from the green belt
3. The development will have a significant impact on traffic on the A31 a route which already has major congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/89  **Respondent:** 9296353 / Victoria Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

To be honest I am not able to comment on whether this document meets the legal requirements as I am not a lawyer or qualified planner.

A2 - Bedford road - I do not see the need for additional restaurants here with the number of restaurants already in Guildford and the proposed conversion of the Tungate. Can this area not be used to better enjoy the river aspects.

A11 - Guildford car park - where are you proposing people park instead? This takes a reasonable chunk of parking spaces away from the station for commuters. I also strongly object to any construction similar to Woking station. It looks awful, the style of the buildings have not worn well with time and it detracts from the view of Guildford.

A12 - Bright hill - this has to be the worst proposal. How will you fit 60 homes on that site without totally ruining the aspects and views for all the other home owners in the vicinity. It is also a great venue to sit and take in the view over Guildford. Where will people park instead? If you are proposing all these new shops and restaurants, surely this means more visitors. I would rather retain this site over Sydenham Road car park, where traffic flow is a nightmare, dangerous and non moving when there is a queue for the car park which is every weekend. The council has already removed enough car parks. Provide the data that this car park is no longer required. I sincerely hope that there will be further consultation before decisions made.

On a general note it is very difficult to provide more detailed comments on proposed sites as you are not providing visuals of what is being proposed. Will you be doing so?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1162  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1161  Respondent: 9298465 / Peter Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010–2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithembarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tithembarns Lane (Burnt Common and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been compiled with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4488  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4489  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4478  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/4479  Respondent:  9298465 / Peter Grover  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/4480  Respondent:  9298465 / Peter Grover  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/4491  **Respondent:** 9298465 / Peter Grover  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/4487</th>
<th>Respondent:</th>
<th>9298465 / Peter Grover</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/4485  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4486  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4490  Respondent: 9298465 / Peter Grover  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular pastime, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

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**Comment ID:** PSLPP16/4484  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY ID3**

I OBJECT to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4476  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires...
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4492  Respondent: 9298465 / Peter Grover  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4477  Respondent: 9298465 / Peter Grover  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4474  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**Answer**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearne West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policypermits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/809  Respondent: 9298465 / Peter Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am writing to show my objection and dismay at the proposed abolition of Green Belt Land around the villages of Chilworth, Shalford, Peasmarsh and surrounding villages. Green Belt land should be reserved for exactly what it says GREEN BELT, the villages are in an area of Outstanding Natural Beauty within the Surrey Hills.

Pollution through extra traffic through the villages and the destruction of wildlife habitat will have a completely detrimental affect on the 'country side'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Pollution through extra traffic through the villages and the destruction of wildlife habitat will have a completely detrimental affect on the 'country side'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A22 Land to the north of Keens Lane

OBJECT.

1. It is good Green Belt. The reason given for dropping the neighbouring Liddington Hall site is because of the "high sensitivity Green Belt". The same should apply to the Keens Lane site.
2. It is part of the important wild life corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with PPF paras 1 13, 1 17, 1 18, and 1 19.

1. It is very close to the SPA of Whitmoor Common and the drainage to the Common from the development could not be gainsaid (see the comment on Policy 5). None of the suggested SANGs would offer anything like an altruistic approach.
2. It would add to the chronic traffic congestion in the sector (see Policy J 1). Traffic is a major factor that has been cited in the rulings in the rejection of three previous proposed developments in this immediate area: In 1976, the inspector recommended: "The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded . . . .". In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan: "Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddingon Hall/". In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended: "In my judgement, the discharge to A3222/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads." In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated: "The findings thus far suggest that the transport impacts associated with the north west community [the liddingon Hall site] would be significant and difficult to resolve." These previous rulings are vital and cannot be ignored. A park-and-ride is being mooted but the A322 and A323 are narrow and could not take bus lanes, which would inhibit their usefulness and take up. A park-and-ride may take a few hundred cars off the roads but the proposals would add several thousand extra vehicles to those already in use in the area.
3. Great Crested Newts have been found and photographed immediately either side of the site. They are a protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3793  Respondent: 9298689 / Rod Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A26 Blackwell Farm

OBJECT. This is an appalling desecration of the AONB and its surroundings. It is good Green Belt (see QJ). The University should get on with the planning permissions it already has.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8086  Respondent: 9298689 / Rod Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4 - Surrey Research Park

OBJECT. This appears to allow the expansion of the Research Park into a more general Business Park. It should certainly not be allowed to take up Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8087  Respondent: 9298689 / Rod Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7 - Guildford Town Centre

OBJECT. Guildford is in danger of throttling itself. It is not suited to be a 'growth hub'. It does not need more retail. The emphasis should be more residential use and preserving its historic appeal and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8082  Respondent: 9298689 / Rod Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Policy H 1- Homes for all

OBJECT. One particular point is the University's 'land banking', applying for more homes when they have plenty of unfulfilled permissions. Stopping this would release homes (and increase council tax take, students being exempt). The university should be aiming for many more students to be on campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8083</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Policy H3 - Rural Exception Homes

OBJECT. This seems to allow building anywhere, regardless of restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8088</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Policy 11 - Infrastructure and delivery

OBJECT. There is a hopeless mismatch between the housing aspirations and infrastructure. Apart from a few hopes around the A3 junctions, nothing is suggested that might help in any material way. This is true throughout Guildford but particularly in the NW sector. In 2011, Guildford was labelled the 42nd most congested city in Europe. There are already serious problems with the AJ and the local roads, of which the northwest sector with the A320, A322 and A323 is probably the worst. But still there are sites in the plan for this sector. See in particular site A22, Keens Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8089  Respondent: 9298689 / Rod Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 12 - Supporting the DOT's 'Road Investment Strategy'.

OBJECT. Obviously we must support the DOT but to put faith in an A3 tunnel gives a new dimension to the term 'wishful thinking'. There is simply no indication of how the traffic infrastructure could be modified to support the new proposals. Nor is there any mention of the Surrey County Council’s £800,000,000 infrastructure deficit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8084  Respondent: 9298689 / Rod Wild  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 - Green Belt

OBJECT. Insetting villages in the Green Belt is contrary to the whole spirit and intention of the Green Belt. Insetting Fairlands is an example and could allow inappropriate planning applications having to be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- **Policy P5 - Thames Basin Heath Special Protection Areas**
  - OBJECT. The whole SANG concept is deeply flawed. There is a fundamental requirement in European law that developers and the Council must have convincing, objective evidence that developments have no adverse impact on the PA (Waddenzee judgment, case no: C-127-02). This does not appear to have been done for a number of sites. The SANGs put forward are mostly already in public use, further away from the planned developments, and irredeemably less attractive than the sandy heaths of Whitemoor Common.

- **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
- **Attached documents:**

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- **Policy S1 - Presumption in favour of sustainable development**
  - OBJECT. The huge number of homes proposed takes insufficient account of transport and infrastructure problems.

- **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
- **Attached documents:**

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</table>
Policy S2 - Borough wide strategy

OBJECT. Again, the huge number of houses makes no sense for Guildford, a 'gap town' with serious movement restrictions and natural constraints. The Council has the right not to build on the Green Belt but has not taken it. The HMA figures have been widely and rightly criticised for many reasons but scrutiny of the methodology has been denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/12 Respondent: 9298689 / Rod Wild Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A22: Land north of Keens Lane, Guildford – OBJECT

I object to the increase of housing provision for this site in the revised 2017 Local Plan. The site was unsuitable previously and any increase in housing numbers will only make matters worse. The adverse factors are so strong that I find it amazing the site is being put forward for an increase of any size. Some of them are listed below:

1. a) It is good Green Belt. The reason given for dropping the neighbouring Liddington Hall site is because of the "high sensitivity Green Belt". The same should apply to the Keens Lane site.
2. b) It is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.
3. c) It is very close to the SPA of Whitmoor Common and the damage to the Common from the development could not be gainsaid (see the comment on Policy 5). None of the SANGs that have been suggested would offer anything like an alternative.
4. d) It would add to the chronic traffic congestion in the sector. Traffic is a major factor that has been cited in the rulings in the rejection of three previous proposed developments in this immediate area:
   In 1976, the inspector recommended: "The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded ...."
   In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan: "Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall". In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended: "In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads."
   In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated: "The findings thus far suggest that the transport impacts associated with the north west community [the Liddington Hall site] would be significant and difficult to resolve."
   These previous rulings are vital and cannot be ignored.
5. e) Keens Lane is too narrow in much of its length for two cars to pass each other, and the increase in traffic generated by the development (or any development here) presents a hazard. Any increase in traffic along Gravetts
Lane and Tangle Lane is hazardous, given their narrow width, high banks and hedgerows, and an acute blind corner.

6. f) Great Crested Newts have been found and photographed immediately either side of the site. They are a protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/861  Respondent: 9299745 / Simon Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has not been open and transparent and is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6589  Respondent: 9299745 / Simon Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to development of Sites A36-41 (East and West Horsley) as stipulated in the Guuildford Borough Council Draft plan. The plan states that the proposals will have particular regard to 'the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape'. Over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Former Wisley Airfield (FWA/TFM), an area that at present has only 0.3% of the population of GBC. I don't see how this can be justified as the proposal recommends increasing the number of properties in the West Horsley alone by over 34% without any significant investment in infrastructure to the surrounding areas. For example, both local primary and secondary schools are hugely overcrowded and oversubscribed and want to instigate plans to expand to at least enable them to meet existing demands.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the
countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and protect the village’s green spaces, including the FWA/TFM. The size and condition of roads, drainage and supplementary transport links, particularly the train services will not cope with such a huge increase in demand without significant investment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6724  **Respondent:** 9299745 / Simon Runton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and protect the village’s green spaces, including the FWA/TFM. The size and condition of roads, drainage and supplementary transport links, particularly the train services will not cope with such a huge increase in demand without significant investment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6725  **Respondent:** 9299745 / Simon Runton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I believe this is a flawed policy and I object strongly to the plan. I suggest all Green Belt sites should be removed from it until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as I understand case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6723  **Respondent:** 9299745 / Simon Runton  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that most new houses designated in the plan will be outside the local urban areas, forcing the increase in rural or semi urban areas which are far more likely to struggle to cope with sudden increases in population. There seems to be very little consideration given to viable alternatives better suited to an increase in affordable accommodation, such as Guildford. This is recognised as an area that can benefit from redevelopment of specific urban areas for lower cost housing rather than solely focus on developing green belt land.

The plan states that the proposals will have particular regard to 'the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape'. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Former Wisley Airfield (FWA/TFM), an area that at present has only 0.3% of the population of GBC. I don't see how this can be justified as the proposal recommends increasing the number of properties in the West Horsley alone by over 34% without any significant investment in infrastructure to the surrounding areas. For example, both local primary and secondary schools are hugely overcrowded and oversubscribed and want to instigate plans to expand to at least enable them to meet existing demands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The West Horsley issues I object to are as follows:

- The council is not choosing to constrain its housing growth in Green Belt areas and the proposed developments still represent a large number of dwellings on Green Belt space, which was established to prevent urban sprawl not facilitate it. The continued submissions of the Local plan squarely fail to meet any of the infrastructure issues and relies on inaccurate information and excessive erosion of Green Belt land.

- I question the Council’s predictions for Guildford’s level of growth which is 25% more than the Office of National Statistics prediction for the area by 2034. Surely it is an error to base a plan on figures that differ so markedly from national forecasts and flawed evidence must not be relied upon to justify the inflated predictions.

- Nothing has been proposed since last years Consultation to improve sustainability of the West Horsley development sites and therefore meet the National policy requirements. The road network is already over used, in poor state, is prone to flooding in poor weather. The train station carparks are already full up at rush hour. The primary and secondary schools in the area have both applied for expansion to meet existing needs and these have been rejected. I therefore do not understand...
how an infrastructure that is over subscribed already can fit the further demand expected of 400 new homes in the area. The same applies for the Doctors surgery which is at capacity.

- I object to no changes being proposed since the 2016 consultation to insetting West Horsley from the Green Belt and welcome the reduction in the number of new homes being proposed, but the Local Plan does not go far enough to maintain Green Belt land.

- The number of proposed dwellings will fundamentally change the character of the village, yet Guildford town centre and brownfield sites appropriate for dwellings are being overlooked in preference for further retail space when many published studies show online retailing is growing at the expense of the high street.

I object to the Three Farms Meadows site proposal because:

- There are severe constraints with the A3 and M25, one of the most congested areas of road at one of the busiest motorway junctions in the country.

- Local road networks cannot sustain a development of that size with roads prone to flooding in poor weather, buses and lorries in Horsley do not have enough room to pass cars without them stopping or in too many instances, mounting the pavement.

- There is not enough employment opportunities on the site for a development of that size which will only lead to more cars and commuters adding to the severe congestion, because of this it is inappropriate to assume that the local roads will be fine for cycles instead. The roads are poorly lit, not big enough, in poor repair so cyclists who do use them often have to cycle further from the kerb for their own safety than the Highway Code recommends

- The proposed removal of over 3 hectares of Green Belt has been included without justification

- The significant modifications made to the plan mean that it should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

- The evidence base especially the West Surrey SHMA and the Guildford addendum 2017 has been challenged by other experts including NMSS.

Please consider the following in addition to the objections I have already raised regarding both these developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have reviewed the sites and development that have been identified in the Horsleys and have serious concerns over the following impacts that will be had on the two villages:

1. The area is greenbelt land (and adjacent if not within the Surrey Hills AONB), where it is required that “exceptional circumstances” should be the only reason that would allow this development to take place. No evidence has been provided of how “exceptional circumstances” have been met and it is difficult to see how this is the case. A nature area of great natural beauty will be taken away forever with these new large developments going ahead.

1. Plenty of opportunities exist elsewhere within the commuter belt (and inside the M25) where housing needs can be met with far less impact on an area of such natural beauty. These areas ad sites should be used prior to ruining the countryside in the UK which is constantly being put under threat before more appropriate sites are considered.

1. The development would ruin the nature of this AONB and green belt. It would be forever changed. Local flora and fauna, which are already so greatly under threat in England, would be placed under further pressure to relocate further afield or otherwise die off.

1. The infrastructure in the Horsley’s is not sufficient to deal with this level of development

The local school (Raleigh) is not able to support even the villages as they currently stand. We live in West Horsley and the catchment area does not even extend to our home. We have a 2 year-old daughter that will be applying for a school in a year’s time and will not fall within the area currently and will already need to look for schools outside our village. There are already 2,000 houses to be built in Ockham (Wisley airfield) which will put pressure on road and rail transport and other infrastructure in the area as it is, even before the Horsley developments have been considered. The roads are busy enough already and are narrow and will not be able to cope well with the huge influx in traffic that will be created.

If houses are to be developed, a new school, traffic lights, wider roads and other infrastructure would need to be planned for implementation at the same time as the completion of the houses if the plan were ever to even go ahead to reduce frustration and annoyance within the local community.

5. The increase in households proposed of up to 35% is the highest in the borough and in an area that would have the most detrimental impact on the AONB. This would more than likely make it unsustainable and the quantity of housing far exceeds the needs for the local area by some 70% over the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/430  Respondent: 9319777 / Mark Seligman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write in relation to the current consultation on the above, and in particular Policy P1.

I am very concerned about a reduction in the protection awarded to the Surrey Hills Area of Outstanding Natural Beauty (AONB). This would become dependent on the Surrey Hills Management Plan. This welcomes housing development.

I do not believe housing development should be allowed in the Surrey Hills AONB except in the case of exceptional circumstances. Such exceptional circumstances should be carefully defined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1655  Respondent: 9319777 / Mark Seligman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the weakening of the protection against non-major development in an AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2696  Respondent: 9320289 / David Francis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send, Ripley and Burnt Common proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5664  Respondent: 9320289 / David Francis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy a44 land west of Winds Ridge and Send Hill for 40 homes and 2 travellers pitches. This local amenity is well used by the local community and is also an old landfill site. It has green belt status and a beautiful area of countryside would be spoilt by any development. Any disturbance of this old landfill site is potentially dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11145  Respondent: 9320289 / David Francis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all in setting i.e removal of villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4042  Respondent: 9321281 / leone palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/20</th>
<th>Respondent: 9322113 / John Lillywhite</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At present the infrastructure cannot cope with the current number of people and vehicles:
- it is impossible to park at East Horsley station
- the trains are standing room only after two stops in the mornings
- it is not possible to get a doctors appointment with the doctor you want on the day you want
- the roads are falling apart
- the local schools are over subscribed
- pollution is toxic around junction 10 on the M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/19</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to protest in the strongest possible terms to the proposed development plans around East and West Horsley. They also represent a major destruction of the Green Belt.

To add to this problem is totally irresponsible apart from the destruction of large swathes of the green belt.

Why can no-one think about the reintroduction of the regional development scheme that used to finance business and people to set up in parts of the country where the infrastructure can cope?

We need to look at how the increased needs can be reduced in the South East before it sinks under concrete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18  Respondent: 9322113 / John Lillywhite  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I wish to protest in the strongest possible terms to the proposed development plans around East and West Horsley. The plans represent too much development in too short a period for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6465  Respondent: 9322273 / Chris Waddington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I wrote in May 2016 concerning the draft proposal to build 1 100 homes, a secondary school and showpeople pitches on land which is green belt land. I feel that my objections have been disregarded in the Proposed Submission Local Plan.

The proposed development is enormous and disproportionate to the current size of the village.

Land that is currently used for grass, horses and a smallholding but could be used for more varied agricultural purposes is to be lost to development.
The land in the village is very wet and poorly drained. Development of the scale proposed would require substantial changes to the drainage in the whole village.

The huge increase in traffic that would be generated would require substantial modifications to the current road network, modifying existing junctions with Guildford Road and either installing traffic lights at the narrow railway bridge on Westwood Lane or replacing it altogether. The A323 is already a busy road at peak times with traffic delayed by the lights at the junction with Pirbright Road and the level crossing in Ash. It has had a number of fatalities and other accidents in recent years.

There would be insufficient places at the local primary school so expansion on that site would also be required.

I am concerned that the in-building that this proposal would allow between two lanes (Glaziers Lane and Westwood Lane) would soon result in more in-building so that there would be an urban sprawl from Guildford to Aldershot, losing the rural nature of the villages on this side of Guildford

I recognise that there are sites in the village which could be used for small developments (like those that have been built in the past such as Orchard Close and The Paddocks) and feel that all villages in the Guildford area should be looking to identify such sites so that the number of houses needed in the borough can be shared around the villages.

I understand that GBC is required to demonstrate that exceptional circumstances are needed to justify releasing Site A46 from the Green Belt but there is no clear evidence that there are such exceptional circumstances and there is no assessment of the effect this development would have on the neighbourhood.

The argument for a need for a secondary school does not seem to be substantiated with current local schools considerably undersubscribed. Maybe if the development went ahead there would be a period when such a school would be needed but this is likely to be short term only. It seems more logical to extend school provision close to Guildford to give easier access to all areas around Guildford rather than to site a school in a local village which would require pupils from all other areas to first travel into Guildford then out again.

In summary, I still object to the new Local Plan in the way that it affects Normandy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/1993</th>
<th>Respondent: 9323361 / Paul Holden</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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<td>I object to removal of Ripley from the Green Belt</td>
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I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment. Please confirm receipt of this letter and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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- I object to removal of Ripley and Send Marsh from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
• I object to housing development at Clockharn Nursery,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3916  Respondent: 9323361 / Paul Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to housing and business development proposed for land described as Garlick's Arch,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3915  Respondent: 9323361 / Paul Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to an expanded A3 interchange at Burnt Common,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3918  Respondent: 9323361 / Paul Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to housing development at Send Hill, all of these sites being unsuitable and in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8346  **Respondent:** 9323361 / Paul Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9526  **Respondent:** 9323361 / Paul Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment. Please confirm receipt of this letter and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt
- I object to removal of Ripley from the Green Belt

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".
Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

- I object to an expanded A3 interchange at Burnt Common,
- I object to housing and business development proposed for land described as Garlick's Arch,
- I object to housing development at Clockbarn Nursery,
- I object to housing development at Send Hill, all of these sites being unsuitable and in the Green Belt

I object to the proposed Local Plan in so far as Send is concerned because there is:

1. no clear assessment or evidence in support of the assumptions the plan is based on
2. no exceptional circumstance justifying taking land around Send out of the Green Belt
3. no evidence of a requirement for the proposed scale of development
4. excessive proposed housing and industrial development
5. no evidence of need for extra industrial or warehousing land in Send
6. no reliable projected housing need thus rendering the Plan invalid
7. substandard and only partial connections onto the main A3 and M25 roads

1. a very poor and overloaded local road network connecting with towns such as Woking and Guildford
2. existing chronic traffic congestion
3. inadequate other infrastructure such as schools and medical facilities

Furthermore, the proposed plan for Send does not take account of what local residents want. Most people support the presumption against building in the Green Belt as now established. The National Planning Policy Framework is ignored.

We risk losing beautiful countryside and lovely places to walk, conservation area riverbank along the River Wey, our wildlife, woodland and open fields, likely becoming a congested suburb.

The Local Plan as proposed is not a template for sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [LP2016 Local Plan Objections Attachment Paul Holden.pdf](5.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- MP response - guidforddraftplan.2014.09.21.pdf (4.4 MB)
- Document.docx (10 KB)

Comment ID: pslp171/1421  Respondent: 9323361 / Paul Holden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write as required ahead of a 24 July deadline to object to the New Draft Local Plan 2017 because:

- I object to removal of Send Village from the Green Belt,
- I object to removal of Ripley and Send Marsh from the Green Belt.

Although previous draft local plans were withdrawn after widespread local opposition there has been no recognition of local feeling and opinion in formulating this third version.

A blizzard of paperwork renders the plan opaque to a yet greater extent. Impenetrable lists of changes of no substance to complainants' responses require a massive effort to engage with at even a superficial level.

GBC assert that objections will only be accepted if related to the New Plan changes; I say that is wrong.

Nevertheless I hereby object to the New Plan changes to ensure my complaints are recorded:
Clockbarn, Tannery Lane Policy A42 - an increase to 60 additional dwellings will worsen traffic problems and damage our green belt,
Garlick's Arch, Send Marsh Policy A43 - 400 dwellings and 6 traveller plots are not appropriate in the green belt,
Burnt Common, Policy A 58 - industrial/warehouse development in the green belt isn't needed or appropriate,
Green Belt Policy 2 (para 4.3.15) - inset of Send Business Park is an inappropriate green belt intrusion.

Each of these changes would increase traffic, spoil the countryside and defeat the green belt protection carefully husbanded for 75 years.

I fully support the Save Send Acton Group's propositions in their attached commentary leaflets.

Sir Paul Beresford our Mole Valley MP has said of the plan process:

"This catalogue of errors and omissions has fed to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough."

Sir Paul's commentary applies to the revised plan; his observations seem to be ignored.

Infrastructure in Send, Ripley, Send Marsh and Clandon being already massively overloaded, small disruptions cause gridlock over much of our essentially rural roads network so please also note that I still object to:

- an expanded A3 interchange at Burnt Common,
- housing and business development proposed for Garlick's Arch,
- housing development at Clockbarn Nursery,
- housing development at Send Hill.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Untitled.pdf (2.5 MB)
Destroying essential farmland and countryside by covering it with structures producing global warming gases will only exacerbate the communities health problems and lead to more expensive foods.

The plan should make a firm statement that it is committed to improving the life of all the community (and not just for the benefit of the developers and their shareholders) by providing better roads, footpaths, safe cycleways, easy access to schools and healthcare, parks and countryside to play in.

The plan should detail the essential need for council homes for young families and care homes for the elderly. The council have been selling off these essential facilities without replacing similar numbers. The council should stop selling council houses and replace its missing stock as a priority. Building homes for the rich should not be part of the Local Plan.

Growth and Progress should mean making a better life for everybody, it is not about making lots of money and driving big cars.

We must not destroy the countryside which provides the essential elements for us to exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/203  Respondent: 9326433 / Keith Kerr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the revised plan because the evidence base and the submission documents do not take a fair account of what is required to achieve positive and sustainable growth for a better future for all, including following generations. The plan fails to explain how the current failing services will be improved to meet the demands of a larger population.

The infrastructure must be seen to be working efficiently before you start squeezing more homes into an already congested site.

The proposed number of new homes (12,426) does not reflect the will of the current population and the number would appear to be greatly excessive when taking the result of the EU referendum into account.

The number of affordable homes is inadequate for our needs, and the cost of these homes is far to expensive for anyone on an average salary. How can you legally describe them as being affordable?

The alterations to the plan seem to make it easier for developers to build lower quality and less energy efficient homes. Zero-carbon homes can be built and these should be an essential element of your policy. All developers should have to produce detailed construction plans and energy use calculations for their proposed development. This should include the carbon cost for the source and the manufacture of the raw materials used in the construction, the lifespan and maintenance of the homes together with risk assessments for carrying out alterations or demolition. We need this information so that we can be seen to be protecting the future for following generations and making our best efforts to avoid global warming.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/14958  **Respondent:** 9327009 / sp2 Consulting Limited (Stephen Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I PART SUPPORT, BUT PART OBJECT. I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings. There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, have vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14959  **Respondent:** 9327009 / sp2 Consulting Limited (Stephen Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I PART SUPPORT, BUT PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I PART SUPPORT, BUT PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
Comment ID: PSLPP16/14949  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT because
• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14950  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. I believe that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14951  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14952  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. I support the maintenance of research, development and design activities, in any science, including social science, which is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not, however, believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14953  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism, which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Guildford is the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion, which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character, which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPP16/14957 | Respondent: | 9327009 / sp2 Consulting Limited (Stephen Parker) | Agent: |
| Comment ID: | PSLPP16/14939 | Respondent: | 9327009 / sp2 Consulting Limited (Stephen Parker) | Agent: |

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I PART SUPPORT, BUT PART OBJECT I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

| Comment ID: | PSLPP16/14939 | Respondent: | 9327009 / sp2 Consulting Limited (Stephen Parker) | Agent: |

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I object overall. I support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14940  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable homes – I OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14941  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield. The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England (“HE”). It is only reasonable that the council will work closely with HE to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements. However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. I support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered, including:

- It is not sustainable to build dormitory towns and call them sustainable.
- Not everyone can cycle all the time.
- How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.
- Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?
- The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.
- While I welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14943  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14945  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt, which is anomalous. I am not in favour of building on this area – the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!). However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14947  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate. However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14948  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14935  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development and that level of constraint should be spelled out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14937  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT. 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford’s housing problems are exacerbated by the low percentage of student accommodation provided on campus by the University. The figure should be between 80-100%, which the University could reach by implementing existing permissions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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The main threat to Guildford’s economy is the lack of infrastructure. With perhaps the exception of the Surrey Research Park, all of the other large employers, such as Game, could operate anywhere in the country. If their workers cannot get to work or meetings are constantly starting late as visitors are held in traffic, then there is nothing to stop the Companies moving. They are here for all that Guildford and its surrounding environment has to offer. If this is diluted by unnecessary development and its impacts then the economic future of the Borough is at risk. This is now partly acknowledged by the Plan but still the housing numbers remain largely unaltered. The Plan now acknowledges the existing infrastructure shortfall but still proposes very significant increases in housing with no deliverable proposals to address the shortfall, let alone cope with all the extra demands a near 10% increase in population would make.

The reduction in housing numbers is largely, and is very much the case for the Gosden Hill Farm site, just moving the completion date. The final development would still be of the same size as before, just completed after the proposed plan period.

Nothing has been done to address the traffic issues for Burpham that 10,000 plus vehicles per day [2,000 homes x an average of 2 per home x 2 (away/home) plus workers/children] plus the additional traffic caused by the Park & Ride proposed for Gosden Hill Farm. With only one entrance and exit for the site the proposal is unsustainable.

Whilst additional housing is needed the figures produced by the SHMA are in error and do not account for the EU Referendum result or use latest ONS population projections. The figures produced by the Guildford Resident Association own SHMA are more sustainable and deliverable. The Plan also does little to provide homes that are actually affordable for key sector and other workers. The 80% of normal market price definition does little to help with Guildford house prices. Also i do not feel it is possible to build sufficient homes to reduce the prices to have a useful effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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6.1 Policy A29 now looks to provide for some 1,750 dwellings rather than the 1,200 proposed in the June 2016 PSLP. This increase is explained at p7 of the 2017 LAA update as being due to the fact that it now encompasses ‘planning permissions in the area that have not yet commenced due to the current unavailability of Suitable Alternative Natural Greenspace (SANG).’ Whilst we would take issue with this as the consented site at South Ash Drive (which has consent for 400 dwellings (16/P/00980 refers)), also provides for some 24ha of SANG to accommodate its needs and that of the wider area, we note that policy A29 as amended also now requires:

(1) Appropriate financial contributions to enable expansion of Ash Manor Secondary School by additional 1FE
(2) Appropriate financial contributions towards expansion of existing GP provision in the area or land and a new building for a new GPs surgery
(3) Sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits
(9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station

6.2 Whilst not wishing to comment on criterion 1 and 3, the simple fact is the land at South Ash Drive has already made provision for a doctor’s surgery (criterion 2) such that the need for others to do so is open to debate. Furthermore there is no claw back mechanism within the S106 for the land at South Ash Drive for the developer to receive contributions from others to help off-set the costs of providing the doctors surgery such that this cost has been born solely by those developing the land at South Ash Drive (A2 and Bewley). It is thus questionable as to whether the inclusion of criterion 2 in policy A29 as amended is justified, and accords with national government guidance in terms of the CIL regulations.

6.3 In addition to the above the requirement for the land allocation pursuant to policy A29 to provide for a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing is in our opinion unjustified.

6.4 We understand that SCC is concerned about the future operation of the level crossing due to a) development impacts; and also b) the potential closure of the right turn lane into White Lane from the A31 for highway safety reasons, which may result in traffic re-routing via the level crossing.

6.5 In the context of the above we are not aware that SCC have:-
• Modelled the net impact of development (i.e. considering what already has permission) nor have they tested the re-routing effects of closing the A31 right turn lane (noting that ‘other routes are available’);
• Modelled the impact of the potential increase in trains using the line;
• Looked into alternative options i.e. considered the merits of improving alternative routes to those that use the Ash level
crossing;
• Considered the viability of delivering the bridge relative to the number of sites that have permission and those that remain subject to applications/have yet to be bought forward in the allocated area; and
• Sought to establish those parts of the allocation that will have an impact on the crossing and those that will not.
The above two points will leave relatively few dwellings footing an exceptional bill.

6.6 Given the above we consider there to be no evidence to demonstrate that
A. The bridge is necessary;
B. How much it will cost and how it can be provided; and
C. The programme for its delivery and how this relates to the Council's housing trajectory for the delivery of housing from the Ash/Tongham allocation.
Furthermore we note that the area allocated pursuant to policy A29 does not include the land necessary to provide for a new road and footbridge over Ash railway line, such that the councils ability to ensure delivery of this facility has not been demonstrated.[12]

6.7 On the basis of the above we do not believe the introduction of criterion 9 in policy A29 as amended to be justified, or to accord with national government guidance in terms of the CiL regulations.
6.8 In addition to the above we would point out that planning permission exists within the area designated pursuant to policy A29 for the following, which in total will provide for 725 dwellings:-
• 400 homes at Ash Lodge Drive, Ash - Application 12/P/01973;
• 56 homes on land south and east of Dene Close, Ash -Application 14/P/01870;
• 35 homes on land north of Poyle Road, Tongham - Application 12/P/01534 – RM for 26 – 16/P/00663;
• 55 homes at Minley Nursery, Spoil Lane, Tongham - Application 15/P/00293;
• 50 homes adjacent to Grange Farm, Grange Road, Tongham - Application 14/P/02398;
• 26 home on land south of Foreman Park and west of Foreman Road, Ash - Application 12/P/01534; and
• 26 homes on land at Ash Green Lane West - Application 15/P/00167.
• 21 homes on land at 109 South Lane - Application 14/P/01637
• 58 homes on land at Warren Farm, White Lane - Application 16/P/00120

[12] Policy A30 of the 2016 PSLP sought to safeguard land for a new road bridge and footbridge scheme to enable a level crossing closure on the A323 Guildford Road adjacent to Ash railway station. This policy is deleted in the 2017 PSLP. The rational for the deletion of policy A30 and the proposed additions to policy A29 in the PSLP is not clear, such that the deletion of policy A30 will in our opinion effectively prejudice the plans ability to deliver the proposed crossing and is, if the bridge is justified, unsound.

6.9 In addition there are currently outstanding (live) applications with GBC for:-
• 254 homes at Grange Farm - Application 16/P/00222;
• 50 homes at land north of Grange Road - Application 17/P/00529;
• 95 homes at Ash Manor - Application 17/P/00513; and
• 154 homes (an additional 98 homes to those already consented via 14/P/01870) at Land south and east of Dene Close Ash - Application 16/P/01679.
• 150 homes on land on Poyle Road - Application 17/P/01315

6.10 These, if consented will provide for an additional 647 dwellings, such that of the 1,750 allocated pursuant to policy A29, 1372 will have consent/ are awaiting determination, leaving just 308 to pay for the proposed ‘land and new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station’ which is hardly reasonable – i.e. fairly and reasonably related in scale and kind to the development and would not comply with national government guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Criterion 9 of policy H1 looks to address the issue of self-build and custom housebuilding. It states: ‘Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, selfbuild plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.’

In our opinion this policy will create considerable difficulties in terms of its implementation, especially on schemes that are predominately, or totally flatted. In addition it is in our opinion unreasonable to require all sites over 100 homes to have 5% available for self-build. The financial implications of doing so –specially given the requirement for the land to be laid out and serviced upfront needs to be taken into account. Likewise there are the practicalities of efficient site development / conflict between many various developers/ the implications on the discharge of pre-commencement conditions, and the impact on the housing trajectory. Whilst we appreciate the background to the proposed change to policy H1, the implications have not in our opinion be fully thought through and as such, given the fact that paragraph 17 of the NPPF indicates that predictable decision making is a key element of plan making we consider criterion 9 of policy H1 to be unsound as it is not consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.2 Whilst we support the use of the 2014 population projections, these have to be considered in the context of the Housing Market Area (HMA) as a whole, which, as set out in the 2015 SHMA, includes Waverley and Woking. Unfortunately the 2015 SHMA has not been updated to reflect the 2014 population projections across the HMA as a whole. The Addendum of 2017 is for Guildford only and does not demonstrate how the projections play out across the HMA as a whole and thus the implications for the HMA.

1.3 Paragraph 47 of the NPPF is clear that
‘47. To boost significantly the supply of housing, local planning authorities should:
● use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;’

1.4 Furthermore, as set out in PPG, population projections are but the starting point for determining the OAHN. In this context we note that the 2015 SHMA identified a baseline demographic need for 517 dwellings per annum (dpa), based on the 2012-based Household Projections, rebased to take account of ONS 2013 Mid-Year Population Estimates[1]. Paragraph 8.3 of the 2017 SHMA Addendum indicates that based on the ONS 2014-based Sub-National Population Projections the baseline demographic need is for 557 dwellings per annum in the borough. Thus there has in effect been an increase in the baseline need from 517dpa to 557dpa.

1.5 The 2015 SHMA sought to adjust the baseline population projection of 517dpa having regard to economic growth and housing need, affordable housing and market signals, and the need to provide for the demand for student accommodation, to arrive at an overall OAN of 693pda. The difference in the level of uplift applied to the baseline figure to arrive at the overall OAN is set out below. It is clear from the figures below that the level of uplift to address Economic Growth and Housing Need has reduced significantly and that it is this that has for the most part reduced the overall OAN from 693dpa to – 654dpa.

[Table]

1.6 The consideration of economic factors in determining the OAHN is to ensure that there is sufficient housing to support the employment growth scenarios set out in the Plan. The fact that Guildford Borough Council (GBC) appear to have decided that economic growth in Guildford will not be as strong as previously expected does not necessarily mean the Council should reduce its housing requirement accordingly. It has to assess the matter in the context of the HMA as a whole and consider the implications of reducing the housing requirement in the context of the demographic baseline and affordability issues. To do otherwise would ignore wider trends and market signals which as set out below clearly demonstrate a need to increase, not decrease the housing requirement.


1.7 In the context of the above PPG indicates that housing need numbers suggested by household projections should be adjusted if market signals or other market indicators point to an imbalance between the supply and demand for housing. The 2017 SHMA update acknowledges that:
- A significant number of households in the Borough – 517 per annum - require financial support to meet their housing needs.
- To meet the affordable housing need in full based on 40% affordable housing delivery would notionally require almost 1,300 homes per annum to be built across the Borough.
- Longer-term house price growth in the Borough has been above regional/national averages
- Lower quartile house prices are 11.5 times earnings in the Borough

1.8 Paragraph 8.14 of the 2017 SHMA addendum goes on to advise ‘The evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence.’ Yet only a 9% increase to the housing requirement (as adjusted to address economic growth) is proposed to address the issue of affordability. Given the above we do not consider the adjustment to the Initial Demographic Projections to provide for Improving Affordability to be realistic or justified.
1.9 In the context of the above we note that the Local Plans Expert Group has advised the Government that where the house price median ratio is above 8.7 then a 25% uplift should be applied. In Guildford the lower quartile ratio stands at 11.5[2], while the median ratio stands at 12. At present the PSLP provides a 9% adjustment which equates to an additional 52 homes a year. We consider that the affordability adjustment needs to be much greater i.e. 25% in order to begin to have a material effect on improving affordability.

1.10 In this regard we note that at the recent Waverley LP examination the Inspector recommended a market signals uplift of 25% above the 2014 population projections (plus 4.7% vacancy rate) to improve affordability in line with the requirements at NPPG (ID2a-019). As Guildford is in the same HMA and as the affordability issues are not dissimilar we believe a comparable uplift should be applied here. Thus the true OAN is circa 746dpa.

[Table]

[2] Table 50, page 108 of the SHMA main report

1.11 The failure of the PSLP to look to address the needs of London is also in our opinion foolhardy and prejudicial to the credibility of overall housing strategy. One cannot ignore London and its effects in terms of housing requirements across the South East. The Inspectors report into the Further Alterations to the London Plan is clear as to the need for the GLA to engage with the authorities in the South East and the fact the housing strategy advocated in the London Plan is likely to be material to the preparation of plans outside London. Whether or not this is ultimately addressed through an uplift to address market signals, the SA should look to address this to ensure the PSLP is seen to be positively prepared, justified and effective.

B) The unmet needs of the HMA

1.12 The DTC Topic Paper (paragraph 4.41) notes that: ‘There is currently unmet need arising within our HMA from Woking Borough Council. It has an adopted housing requirement of 292 dwellings (2010 – 2027) against an OAN of 517. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes’. At the recent Waverley LP examination the Inspector recommended that Waverley accommodate 50% of Woking’s unmet need. i.e. 1,575 dwellings. During the debate on the unmet need he also made it clear that in his opinion Guildford BC should be looking to accommodate a significant proportion of the residual unmet need. Even if one were to suggest that only 60% of the remaining unmet need (i.e. 945 dwellings) were to be accommodated in Guildford that would equate to an additional 50dpa (945/19). Such that the overall housing requirement should, as set out below be circa 800dpa (15,200 dwellings across the plan period (2015-2034)).

[Table]

1.13 If the full extent of the remaining unmet need from Woking were to be accommodated (821 dwellings – 75dpa) the overall requirement would be 15,599 (821dpa).

1.14 In the context of the above we note that the topic paper on the DTC advises at paragraph 4.49 that: ‘Pursuant to the MoU, the three authorities have also agreed a Statement of Common Ground on housing delivery (Appendix 5). This recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full.’ Appendix 5 of the topic paper on the DTC is however based upon GBC providing for 693 homes per annum not the 654 now proposed. No updated DTC statement has been published.

1.15 We also note that the Topic Paper on the DTC states at paragraph 4.50 that GBC ‘do not consider that we can sustainably accommodate any unmet need arising from Woking’. This is however the wrong approach. The fact is GBC’s capacity to accommodate 564 dpa (+) is a different matter to its assessment of its OAHN. The SA should be identifying the need and then assessing whether the authority have the capacity to accommodate it given the findings of the LAA etc. not determining the OAHN based upon the boroughs alleged capacity to accommodate it. The council’s decision to provide no additional housing over and above the 564 figure to address the unmet needs of Woking needs to be justified if the plan is to be seen to be positively prepared, effective and consistent with national policy.

1.16 Given the above we do not consider the basis for the calculation of the OAHN to be realistic or justified. The issue of how to deal with any necessary uplift to address Economic Growth and Housing Need, and Affordable Housing and Market
Signals, *does not reflect the advice in national policy*, and suggests a plan that *has not been positively prepared*. Likewise the approach to the issue of the unmet needs of Woking *does not in our opinion reflect the advice in national policy guidance*, rather it suggests a plan that is *not positively prepared, will not be effective* and is thus unsound. The overall OAN should be adjusted to circa 746dpa, and the plan should look to provide for an additional 50dpa (minimum) to meet Woking’s unmet needs.

2 The rational for a higher level of housing growth.

2.1 The evidence base provides various reasons why, in addition to the issues of an uplift to address Economic Growth and Housing Need, and Affordable Housing and Market Signals, that the housing target should be significantly greater than proposed in the PSLP. These include the following:

1) Enterprise M3 have made it clear that Guildford is the main town and economic powerhouse for the Borough and plays a key part in the wider Enterprise M3 area; and that it needs to be able to accommodate new development to ensure the future vitality and prosperity of the town and its surroundings.[3]

They have also stated: -

‘Elmbridge, Guildford and Runnymede remain the least affordable locations in the Enterprise M3 area… The cost of renting a home is also relatively high in the Guildford area (some 20% higher than the average for Enterprise M3 area overall). We therefore welcome Local Plan policies that encourage development of more homes…’[4]

In commenting upon the 2016 PSLP Enterprise M3 state:-

‘On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns.’[5]

2) Paragraph 6.3.10 of the 2016 SA states that:

‘Guildford Borough Council is committed to delivering its OAN figure [693dp at the time], having established that there is no potential to justifiably ‘under-deliver’ and rely on neighbouring authorities to meet the shortfall (under the Duty to Cooperate). Whilst Guildford Borough is heavily constrained environmentally, it does not stand-out as relatively constrained in the sub-regional context [6] This conclusion is reached on the basis of Duty to Cooperate discussions, past SA work (notably spatial strategy alternatives appraisal in 2013/14 – see discussion above), an understanding of precedents being set elsewhere, and other sources of evidence. It is evidently the case that under-supplying in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA.

There is an argument for under-supplying to be preferable from an environmental perspective; however, this argument is far from clear cut given an assumption that unmet needs would have to be met elsewhere within the HMA (i.e. within Waverley, which is heavily constrained) or elsewhere within the heavily constrained sub-region. For these outline reasons options that would involve planning for a level of growth significantly below that necessary to meet OAN are considered unreasonable at the current time.’

[5] P22 of the 2017 SA
[6] Which would suggest that there is the capacity to accommodate more than is currently planned for to try and assist in meeting the unmet needs of others/ address the issues of improving affordability/ to take ac-count of market signals etc.

3) P44 of the 2016 SA indicates that: ‘There is a strong argument for ruling out the ‘bookend’ options, notably - Option 1[7] - which performs poorly in terms of socio-economic objectives, with a number of significant negative effects predicted,’

It also advises that; ‘As such, it can be seen that there is no clear best performing, or ‘most sustainable’, option. Rather, there is a need to establish a preferred approach after having determined how best to ‘trade-off’ between competing objectives, and in-light of wide ranging perspectives. ’ Paragraph 8.2.1 of the 2016 SA continues: ‘The Council’s preferred approach is Option 4,[8] which the appraisal finds to perform relatively well, in that it stands out as performing well in terms of certain objectives (notably ‘communities’ and ‘employment’) and does not stand-out as performing poorly in terms of any objective.’

4) The 2016 SA goes on at p46 to advice:

‘Housing - The preferred option performs well as it will put in place a strategy for meeting the borough’s OAN; however, it
is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking). Higher growth options would perform better, but would be problematic in terms of a range of environmental (and transport) issues/objectives, given local sensitivities. It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context. This is the finding of the SA work, but it is also worth noting that the Council’s work to consider safeguarding options has also led to the same conclusion.

2.2 Despite the above the findings on the preferred approach, the PSLP 2016 only sought to deliver 13,860 additional homes by 2033. In this respect we note that:

1) Paragraph 10.5.1 of the 2016 SA states: ‘The proposed housing growth quantum, determined in order to provide for objectively assessed needs (OAN), performs well on the basis that the OAN figure was determined after having taken into account the number of homes needed locally to ensure that growth in the local workforce keeps pace with jobs growth. However, there are arguments to suggest that a higher level of housing growth could have merit, recognising that Guildford residents will also work in Woking and elsewhere in the Functional Economic Area (FEMA), and that at the FEMA-scale there is set to be an undersupply of housing (albeit there may also be an undersupply of employment land / jobs growth).’

2) Paragraph 10.9.12 of the 2016 SA states: ‘The plan sets out to meet the objectively assessed housing need (OAN) figure identified for the borough by the SHMA, and as such significant positive effects are predicted. However, the decision has been taken not to deliver a higher level of growth in order to address undersupply at the housing market area (HMA) scale (emanating from Woking). There are also some question-marks regarding the housing trajectory (and in particular the supply of housing in the early part of the plan period); however, these are detailed matters that will benefit from open discussion during the plan’s examination.’

[7] Option 1 OAN (693 dpa) plus 0% buffer i.e. 13,844 dwellings across the plan period
[8] Option 4 – 2016 SA - OAN (693 dpa) plus 14% buffer i.e. 15,844 dwellings across the plan period

2.3 Paragraph 8.2.1 of the 2017 SA advises that the councils preferred choice is option 1 i.e. OAN (654 dpa) plus 9.4% buffer which equates to 13,600 dwellings across the plan period. Paragraph 10.9.15 of the 2017 SA indicates that: ‘The proposal is to provide for a reduced housing quantum; however, as this is in response to a lowered OAHN figure, it is not possible to conclude that this is a ‘negative’ in terms of ‘Housing’ objectives. The proposed reduction in the quantum of homes provided for in the plan period is in fact greater than the reduction in the OAHN figure, but this again is does not indicate a ‘negative’.’ This in our opinion defies logic and has no regard to the severe and worsening housing needs of the area.

2.4 Given the above we do not consider the rational for the housing target to be realistic or justified. The evidence base, rather than support the figure adopted in the PSLP actually supports a higher figure. The PSLP cannot therefore be said to be positively prepared, is not consistent with national policy, and is thus unsound. The overall OAN should be adjusted to circa 746dpa, and the plan should look to provide for an additional 50dpa (minimum) to meet Woking’s unmet needs.

3 The need for a stepped trajectory as proposed by policy S2.

3.1 Policy S2 suggests a stepped trajectory, with 450 dpa proposed in years 2019/20 and 2020/21, 500dpa proposed in years 2021/22 to 2024/2025, 600dpa proposed in year 2025/2026, 700dpa proposed in years 2026/2027 to 2028/2029, 800dpa proposed in year 2029/2030, 810dpa proposed in year 2030/31 and 850dpa proposed in year 2031/32. In this regard we note that whilst paragraph 4.1.9a of the PSLP suggests that the stepped trajectory set out in the Annual Housing Target table adds up to a sum total of 12,426 homes, this is factually incorrect as it only equates to 9,818 homes. That said, if one includes 654dpa in years 2015/16 – 2018/19 the overall figure is 12,426 dwellings. We also note given the figures set out in the Annual Housing Target table that of the 12,426 dwellings proposed across the plan period, circa 50% are to be delivered in the last 8 years of the plan period (2026/27 (+)). In addition it is clear from the housing trajectory on p21 of the 2016 LAA that the stepped trajectory will result in housing delivery running below the housing requirement year on year until 2027/28 – some 13 years into the plan period – which does not suggest a plan that is positively prepared, effective, or consistent with national policy.
3.2 We also note that paragraphs 4.1.9a and 4.1.9b of the PSLP seek to justify the stepped trajectory on the basis that:-
- ‘This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period’; and that
- ‘This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy’

3.3 Whilst, given the clear and significant housing need in the borough a stepped trajectory seems irrational and contrary to the spatial vision of the PSLP, we note that the 2016 LAA suggests that some 9045 dwellings (net)[9] could be delivered in the first 10 years of the plan period, and a further 1,342 homes with planning permission are expected to deliver new homes in the next 5 years. Thus there is no reason why circa 10,387 dwellings could not be delivered by 2027/28. Indeed added to that which has already been delivered in 2015/16 and 2016/17 (668 dwellings), the plan should be looking to deliver 11,065 dwellings by 2027/28 not 6,926. Thus not only is the rational for the back loading of housing delivery unjustified, but the evidence from the 2016 LAA suggests that the area is in fact capable of delivering over 900 dpa (11065/12 = 922) and does not need to rely on a stepped trajectory that will in effect deliver just 62.5% of that which could be delivered.

[9] P17 2016 LAA

3.4 Whilst the 2017 LAA update provides no comparable assessment of predicted net completions despite the fact it looks to address the addition of new sites to the LAA and deletion of, or changes to, the housing capacity or phasing of existing sites; we note that the housing trajectory suggests cumulative completions of 13,581 which compares to a cumulative completion figure of 15,459 for the period 2015/16 to 2032/33 in the 2016 LAA i.e. is some 2,000 units less. It is however still some 1,000 units above the proposed housing target and given the fact certain assumptions made about former allocations will no doubt be the subject of debate at the EIP, demonstrates that GBC can clearly deliver more than they are looking to plan for – which does not demonstrate positive planning/ a plan that is justified and sound. Furthermore it appears that the level of housing proposed year on year in the PSLP 2017 encompasses a significantly greater gap to the housing requirement in the early part of the plan than that proposed in the PSLP 2016, despite the reduced housing requirement and extended plan period. This appears to be by and large as a result of the rejection of sites that had previously been allocated and again points to a plan that has not been positively prepared.

3.5 Given the above, and having regard to the scale of the housing need in the area, both market and affordable – as evidenced by the SHMA, the affordability ratio, the persistent history of under delivery and the current 5 year Housing Land supply situation (see below), there is no justifiable reason why GBC cannot allocate additional sites to help address its housing requirements/ look to liaise with those with extant consents to try and increase the density of development to improve delivery. The lack of any credible consideration of this approach to help balance the trajectory means the plan is not positively prepared or consistent with national government guidance.

4 The five year housing land supply

4.1 The 2017 LAA and 2017 Housing Topic Paper (HTP) suggest a 5 year HLS of 2.36 year. The HTP also advises at paragraph 4.206 that: ‘Our five year supply as at April 2017 is set out below. This indicates a slight improvement since April 2016. This is primarily as a result of a slightly lower OAN and a reduced period of deficit.’ The 2016 figure was 2.1 years[10].

4.2 Paragraph 47 of the NPPF is clear that:
To boost significantly the supply of housing, local planning authorities should:

identify and update annually a supply of specific deliverable11 sites sufficient to provide five years worth of housing against their housing requirements……

4.3 Paragraph 033 Reference ID: 3-033-20150327 of the NPPG is also clear in that ‘The examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a 5 year supply will have been thoroughly considered and examined prior to adoption’

4.4 Paragraph 035 Reference ID: 3-035-20140306 of the NPPG also advises that LPA’s should ‘deal with undersupply within the first five years of the plan period where possible’

4.5 Whilst we are not commenting upon the content of the HLS i.e. its deliverability, and the lack of any flexibility to take into account any non-delivery/ delay in delivery rates; the simple fact is the failure of the PSLP to be able to demonstrate a 5 year HLS and the continued shortfall against the housing requirement indicates a plan that is **not positively prepared or consistent with National Policy**. Whilst we appreciate the fact that GBC have excluded GB sites from the 5 year HLS calculation as they are not yet allocated, even using the trajectory at p8 of the 2017 LAA, the position would, against GBC’s own target be:

[Table]

4.6 Paragraph: 022 Reference ID: 3-022-20140306 of the NPPF advises that:

‘Where constraints have been identified, the assessment should consider **what action would be needed to remove them** (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.’

Paragraph: 026 Reference ID: 3-026-20140306 of the NPPF continues:

‘It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to **revisit the assessment**, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.’

4.7 Given the above, GBC need to undertake a further review of the LAA/ a further call for sites to identify sites that can be delivered earlier in the plan period. Whilst this may well mean reviewing the site constraints and looking at ways said constraints could be addressed/ looking to allocate a number of smaller sites that are able to deliver more quickly, this is a prerequisite of national guidance, and GBC cannot adopt an **unjustified and negative approach to plan making**. In this respect we note that The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply and we would support the Government’s proposal in the HWP in this regard.

4.8 As currently drafted we do not believe the PSLP has followed the advice in the NPPF, and that the LAA makes generalised and in some cases questionable assumptions about the connection between levels of housing provision, benefits and impacts. Furthermore it fails to consider the extent to which the issues identified might be resolved or mitigated through for example highways and footway improvements, sewerage infrastructure improvements, selective development of parts of sites, the incorporation of green buffers/ SANGS and other measures.

4.9 In the context of the above, as it is clear from the 2016 LAA that GBC have failed to meet the annual housing target of 322dpa established by the SEP for the past 7 years. The cumulative shortfall over the period 2008/9-2014/15 is circa 832 dwellings[11] (63% of the requirement). This is a significant shortfall and demonstrates why GBC should adopt a 20% buffer to address past undersupply. It also goes some way in explaining why there is such an acute housing need in the Borough now. This shortfall should be addressed, and the implications on the current 5 year HLS taken into account. In this regard it is in our opinion imperative that any shortfall accrued in the early part of the plan is addressed as soon as possible thereafter – not pushed back to the end of the plan period via the use of the Sedgefield method of calculating the 5 year HLS situation. Pushing delivery to the latter part of the plan period will just mean that there is a higher risk of the plan failing to meet its housing requirement should any of the major sites being relied on not deliver to schedule. It also leaves less time for the Council to address such shortfalls in delivery through its contingency plans.

[11] P6 of the 2015/16 AMR indicates that 1,422 houses were delivered in the period 2008/9 – 2014/15. The requirement being 2254 (6 x 1322)

4.9 In addition to the above, we have to say that whilst GBC readily accept they do not have a 5 year HLS, there is nothing in the evidence base to suggest that they have discussed this with neighbouring authorities under the DTC or that they have looked to demonstrate how the matter was to be addressed if they are not able to deal with it themselves. The fact that GBC have failed to address this matter is such that the plan is **unsound**

8.1 We are disappointed to note the reduction in the overall housing target from the 693dpa proposed in the 2016 PSLP to 654dpa as proposed in the 2017 PSLP given the dire housing needs of the area. In addition we do not believe the level of housing growth proposed in policy S2 of the PSLP necessarily reflects the true OAHN of the area as the 2015 SHMA is based on out of date household projections, does not in our view look to address the issue of market signals and other indicators that point towards an imbalance between supply and demand, and no assessment has been undertaken of
migration rates, the effects of London and the level of provision to address the unmet needs of adjacent authorities, esp. Woking. The 2017 addendum does not address this as it is not a true SHMA of the HMA – it merely assess housing need in Guildford without looking at the wider HMA. As such the OAHN has not in our opinion been justified and the resultant PSLP is not positively prepared or in accordance with the aims and objectives of National Policy, as required by Paragraph 182 of the NPPF.

8.2 We are also concerned that the plan does not take account of past under performance. This undersupply, which is in the region of 832 dwellings should be addressed in the housing strategy. If it is not the PSLP will not in our opinion be positively prepared.

8.3 We are concerned that the plan provides no flexibility – some flexibility needs to be incorporated into the plan to ensure it is effective and accords with the aims and objectives of national government guidance; and to ensure delivery. Furthermore we are concerned that despite what is said in the 5 year HLS statement of July 2016, the LPA do not have a 5 year HLS and that this matter has not been considered when addressing the DTC.

8.4 Given our position on the housing requirement and existing levels of supply/ the need to address past rates of undersupply, we believe additional land needs to be identified to meet this need. If additional sites are not allocated we believe the PSLP as drafted is unsound and should not proceed to examination as it is not positively prepared/ justified. It should be the subject of further evidence gathering and consultation on additional allocations before it proceeds to submission.

8.5 In addition to the above we do not believe the additions to policy A29 to be justified, or to accord with national government guidance in terms of the CiL regulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: JAA_reps_fro_A2__GBLP__Reg_19__July_2017__final__signed.pdf (502 KB)

<table>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9.1 We suggest, having regard to the above that:-

i) The level of housing development proposed with the PSLP needs to be increased to a minimum of 15,200 (800dpa across a plan period of 2015 – 2034);

ii) Policy A29 should be revised with all reference to ‘Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station’ deleted.

iii) Policy H1 should be revised with criterion 9 deleted.
iv) The SA needs to be revisited in the light of our comments above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1492  **Respondent:** 9331457 / E Wiejski  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

GBC New Local Plan 2016 The Horsleys Main Sites

I am writing to register my strong objections to GBC new local plan 2016. Having lived in East Horsley for 39 years I take a keen interest in the village because I care about it.

The majority of proposed new housing lies within greenbelt. Please take note we will all fight not to loose our green belt or changes to our "identified boundary of the village" I am extremely horrified by the proposal for the two fields near the railway line behind Ockham Road North being developed. If this plan is accepted and these sites developed we will be forced to move causing us much distress, the nature of the village will also be changed beyond recognition. Please take note of all Horsley's residents views as NONE of us are in agreement with GBC proposed local plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/5038  **Respondent:** 9331937 / Margaret Hall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3313  **Respondent:** 9332193 / Save the Hogs Back Campaign  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

This response focuses on the proposed allocation of Blackwell Farm as a major development area in Policy A26, together with associate Save Hogs Back and Campaign to Protect Rural England (Surrey) object to the Proposed Submission Local Plan on the following grounds:

**Legal compliance:**

1. Failure to have regard to national policies and advice contained in guidance issued by the Secretary of State, in respect of policy on Green Belt and Areas of Outstanding Natural Beauty (Planning and Compulsory Purchase Act 2004, s19(2)(a)); and
2. Failure to have regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed to allow the Blackwell Farm development (Policy A26) to proceed (Planning and Compulsory Purchase Act 2004, s19(2)(i)).

**Soundness:**

1. The proposals to remove land from the Green Belt at Blackwell Farm and to promote development there within and in the setting of the Surrey Hills Area of Outstanding Natural Beauty are not consistent with Government policy;
2. The proposal to develop land at Blackwell Farm is not justified as this is not the most appropriate strategy when considered against its reasonable alternatives;
3. The proposal to develop land at Blackwell Farm would not be effective as it is not deliverable over the Plan period due to the impracticability of access and high infrastructure.

This submission sets out the grounds on which Save Hogs Back and Campaign to Protect Rural England (Surrey) support these challenges to the Plan. We ask that:

1. Policy A26 Blackwell Farm, Hogs Back, Guildford be deleted;
2. The Blackwell Farm site remains in the Green Belt;
3. The housing provision in the Plan be reduced by 1,800 dwellings;
4. The infrastructure provision associated with Blackwell Farm be dropped

Access to Blackwell Farm and traffic

2.1 Policy A26 allocating Blackwell Farm for urban development is entirely clear (under 'Requirements: Infrastructure' that "The principal vehicular access to the site will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised". This is impractical. It is also so costly as to be undeliverable. The highways works are also highly undesirable on environmental grounds, which are addressed in section 3 below.

Impracticality of access from the Hogs Back

2.2 Compton Parish Council commissioned RGP - Transport Planning and Infrastructure Design Consultants to advise on the transport and highway implications of the proposed Blackwell Farm development. This report is in draft and available from Karen Stevens. It demonstrates that there is insufficient space on the A31 to construct the minimum necessary road space and associated infrastructure to allow the proposed signalised junction to be built. At least 20m total highway width is required, but the existing highway is just 14m at this point due to the road being contained within the A31 overbridge structure. This could only be remedied by hugely expensive highways improvements on the top of the Hogs Back, including widening the A31 bridge over the A3 and acquiring and demolishing dwellings on the north side of the A31. These have been omitted from the estimate of costs for enabling the Blackwell Farm development to proceed.

2.3 The report also shows that the anticipated traffic volumes on the roads meeting at the top of the Hogs Back are easily sufficient to warrant the construction of a roundabout at this Guildford Borough Council has not proposed a roundabout, presumably because there is wholly insufficient space for this to be built, and there is a likelihood of significant danger to highways users from attempting to insert a roundabout in immediate proximity to the split-level A31/A3 junction. Whether a signalised junction could work remains unproven.

2.4 The road layout at the eastern end of the Hogs Back is The proposed access off the A31 into Blackwell Farm would be at the existing Down Place junction. This is a very small junction which would need major improvement including left and right egress lanes onto the A31 which extend well back to absorb the substantial volume of vehicles expected to queue at the signalled junction. The road layout would need amendment to overcome the sharp dog-leg bend in Down Place close to the A31 junction. It is not certain that the existing bridge over the A31 exit slip-road (onto the A3 northbound) is wide enough given the need for bus, pedestrian and cycle access. There are also existing traffic restrictions in place to limit bridge loading.

2.5 Even if all these upgrades to the highways were achieved, the road layout would frustrate many drivers. First, modelling suggests (Surrey CC SINTRAM model - see RGP Figure 3.1) that two thirds of Blackwell Farm residents exiting Down Place onto the A31 in the morning peak would expect to turn left towards Guildford. The road is already heavily congested at this point at this time, so exit would be limited to a few vehicles that could find some exit space at each phase of the proposed traffic lights. There would be substantial queues back towards Blackwell Farm. Second, the road layout also seriously impedes access to or from the A3 north-east of the site around Guildford city centre. Drivers southbound on the A3 aiming at Blackwell Farm would take the A31 diverge to join the A31 westbound, but this would find themselves west of the Down Place junction to Blackwell Farm. Drivers would therefore be obliged either to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000 where they could turn around. Either would be frustrating and time-consuming. Both would be dangerous, as accident statistics presented by RGP demonstrate. Correspondingly, any drivers leaving Blackwell Farm from Down Place and aiming for the A3 northbound would similarly need to turn right and begin their journey by travelling in the wrong direction: they too would need to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000. Then they would return eastbound on the A31, joining the morning peak queue, and take the slip-road to the A3 under the new Down Place bridge in order to travel north on the A3. The numbers of vehicles needing to make these awkward manoeuvres would increase the danger to themselves and to other road users. The alternative would be turn left out of Down Place into queue of traffic during peak hours before cutting through residential streets in Onslow Village and joining the A3 at the Tesco roundabout.
2.6 There is no certainty that the third party land required for the highways improvements would be available; the Borough Council has not demonstrated that it will be. There has been no indication that Highways England would agree to the widening of the A31 overbridge.

Alternative access to Blackwell Farm from Guildford

2.7 Proposed Submission Policy A26 states that "Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue."

2.8 Without this access, the Blackwell Farm site would not be an urban extension but a free-standing urban development which happened to be located close to the edge of Guildford. The likely reason Guildford BC views this as a secondary access rather than the primary one is because it will be very difficult to achieve in a way which significantly increases highway capacity. The starting point for considering the Blackwell Farm site is that access into Guildford and to the A3 would all be via the 'Tesco' roundabout on Egerton Road, which is already highly congested. The Inspector's Report into the Guildford Borough Local Plan Review, in September 2001, reported on the (then) proposed development of Manor Park on Manor Farm:

"The principal access to the site from the A3 and the Stag Hill Campus is the roundabout immediately to the west of the A3 (the Tesco roundabout). This roundabout and other elements of the local road network are likely to be operating above their normal capacity before the development of Manor Farm is commenced" (paragraph 16.9.5).

"...the Council and the highway authorities were satisfied that a sustainable solution to the movement implications of the [Manor Farm] Proposal could be found and that to this end the University would, and could, if need be in conjunction with the authorities, confine the increase in traffic generation from the Manor Farm site to no more than 5%..." (paragraph 16.9.7). "...it is implicit in the agreement that if the 5% ceiling can not be achieved, the scale of the development will also need to be limited" (paragraph 16.9.9).

With that development and much of the Manor Park scheme now implemented, the congestion locally is even worse. We are aware of no efforts to enforce a 5% limit on the increase in vehicles associated with University of Surrey development. Efforts to alleviate this congestion may help, but fundamentally the scale of congestion in the peak periods reflects problems across the local network. If capacity were to be created on the Tesco roundabout, the likelihood is that this would immediately be taken up by the generation of additional trips, currently frustrated.

2.9 Gill Avenue, which passes the Royal Surrey County Hospital and leads directly to Egerton Road, will be difficult to join to Blackwell Farm (to its west). This is because a road would need to follow an awkward route either north or south of the Ancient Woodlands of Strawberry Grove and Manor Copse which shield the whole of the western side of the Research We strongly oppose any access through the Ancient Woodland as this would be environmentally entirely unacceptable. Road access north of the Ancient Woodland would funnel Blackwell Farm traffic through the Research Park. Road access south of the Manor Copse Ancient Woodland would funnel traffic through the Manor Park student village and ruin the setting of a Scheduled Ancient Monument (a moat at Manor Farm). It would also isolate newly constructed Veterinary School buildings from their paddocks. The road would therefore introduce pollution into a series of sensitive receptors (Ancient Woodland, the Veterinary School, student accommodation and horse paddocks) and pose a clear danger to students and other existing users of the area.

2.10 The problem appears to be that Guildford BC decided some years ago to allocate Blackwell Farm for development on the assumption that access problems could be resolved, but now finds that this is not practicable. The Issues and Options consultation in October 2013 proposed the site for urban development, but noted "There are however constraints in terms of access to the site from the A3, particularly given that where access would likely be required is in the AONB or very close to it. The site as a whole is very close to the AONB, which would require sensitive development and careful consideration." Following this, the Council tried to secure access direct from Guildford, via the 'Tesco' roundabout and Egerton Road. The heavy existing congestion on this side of Guildford turned out to make this problematic and little apparent progress has been made. Internal correspondence within Guildford BC on 12 June 2015 obtained only by Freedom of Information request illustrates this:

"Tesco Roundabout (Egerton Road/A3 northbound slips)"
GBC has been developing a junction improvement scheme for Tesco roundabout which could offer a substantial capacity improvement and may significantly reduce peak hour queuing. The improvement is subject to funding and to the existing hotel access being closed to vehicular traffic with a new access from the Sports Park access road. The layout is also subject to Safety Audit and technical approval. However, we thought it would be beneficial to share this layout with you on a confidential basis so that you can be informed of the likely scale of improvement required.

The next stage is for GBC to discuss this layout in more detail with SCC in order to get some idea of the technical aspects of the proposal agreed. For your information, the layout has been presented at the Surrey CC/Guildford BC Joint Infrastructure Group meeting which is also attended by Highways England. *(Email from [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Transport Consultant (Policy) to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Interim Head of Planning))*

Little appears to have come of this initiative so far.

2.11 Meanwhile, Surrey County Council as Highways Authority is concerned about introducing additional traffic into this congested area from the A31. The extraordinary outcome of these difficulties is that the Proposed Submission Local Plan proposes the primary access for Blackwell Farm should be from the A31 at Down Place, whereas Surrey County Council has specifically advised that the primary access should be via Egerton Road.

2.12 Surrey County Council has advised a member of Save Hogs Back that a signalised junction at Down Place would not be adequate for the volume of traffic likely to want to use it, and has therefore been keen to discourage use of that access point. The methods proposed were making the route through Blackwell Farm tortuous and restricting access by means of Automatic Number Plate Recognition (ANPR). This is made clear in the exchange of correspondence between Karen Stevens (Save Hogs Back) and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Transport Development Planning Manager West, Surrey CC) *(see email exchange 3-7 June 2016 ‘Re: Access to Blackwell The Surrey CC response was after consultation began on the Proposed Submission Plan, demonstrating the gulf in approach between the two arms of local government at this critical stage. Surrey CC advised that:"

"were ANPR to be implemented, it could be on a private section that formed the ultimate short link between the new development and the existing UniS activities in West Guildford. This section of the route would therefore not be adopted. ANPR is used on motorways/ other routes (including the A3 between Boundless Road and the A333 where it is in a tunnel) where there are average speed restrictions in place. Clearly these are not used to control access on the public highway, and I recognise that this would be a quantum leap to use this technology on the public highway for these purposes."

2.13 Surrey County Council's position now is that "All of the principles behind the access strategy would need to be justified through the production of a Transport Assessment, which... would not come about until the planning application / pre-planning process. The effect of the impasse is therefore that Guildford BC is seeking to allocate a site which Surrey CC is far from certain of being capable of delivery, with the County Council requesting that matters be left for sorting out at the planning application stage. Guildford Borough Council has been unhelpful in addressing the concerns raised by Save Hogs Back, with a failure to answer emails properly or at all *(see 'RE: Down Place junction {UNC}' 12-19 May 2016 and 'Fwd: Blackwell access' 23 June 2016) and no engagement in the access difficulties raised by their own proposals. Our experiences illustrate the reticence of the parties to accept the lack of feasibility of access to the Blackwell Farm site. In our view it would be irresponsible for the forwarding planning process to allocate Blackwell Farm without absolutely clear understandings of how access to it would be achieved, what the network effects would be, how congestion would be avoided, and who would pay for the necessary infrastructure. It is clear that there are currently no answers to these questions."

*Through access between the A31 and west Guildford via Blackwell Farm*

2.14 The Proposed Submission Plan is clear in Policy A26 that "A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3
junction, in advance of the delivery of Highways England's A3 Guildford scheme." In other words, the intention is to attract additional traffic off the A31 and A3 through the Blackwell Farm site in a 'Sustainable Movement Corridor'. We consider there is nothing sustainable in a glorified rat-run.

2.15 Guildford Borough Council is explicitly trying to promote what Surrey County Council is trying to avoid. Given that both ends of the route have proved impractical just to meet the impacts of the Blackwell Farm development, we consider a further increase in their capacity is wholly unrealistic. This confusion is wholly We consider the Plan is unsound on the ground that it is not deliverable. In addition to the practicability, we notice that Policy A26 in the Plan expects the Blackwell Farm development to pay for this additional infrastructure for other users attracted to the area: "Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network."

2.16 There are practical problems in putting a through route into position between Gill Avenue and the A31 at Down Place while serving the Blackwell Farm Connecting the 'Sustainable Movement Corridor' to Gill Road will be problematic. The routes noted in paragraph 2.9 above would be tortuous if north of the Ancient Woodland, while a link south of the Ancient Woodland would barely serve the Blackwell Farm development at all (which would all be to its north). Both routes would send through traffic to the hospital and elsewhere through residential areas (Blackwell Farm or Manor Park campus).

2.17 Not only are the access routes in the Proposed Submission Plan inadequate for the task, but Surrey County Council and Guildford Borough Council have played down the traffic volumes which will need to use them at peak periods:

- the data from SCC's Strategic Highways Assessment Report are the average for the morning peak three hours (not the average for the morning peak one hour, which would be 16% higher);
- no allowance has been made for the impacts of promoting a through vehicular link, but the SHAR is forced to acknowledge that, with this, "then flows through the development may be higher still" (paragraph 4.7.S).

The higher real traffic volumes in the peak may necessitate still larger works at the accesses, with associated practical problems and also additional costs.

2.18 The effect of these numerous deficiencies and confusions is that there is wholly insufficient evidence to demonstrate that the access arrangements in the Proposed Submission Plan to and through the Blackwell Farm site are actually deliverable. This is in breach of Government policy:

- it is the intention in DfT Circular 02/2013 *The strategic road network and the delivery of sustainable development* on capacity enhancements that "Capacity enhancements and infrastructure requirements to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs."

Paragraph 158 of the NPPF similarly requires that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area" (emphasis added).

The proposals have therefore failed to have adequate regard to national policies and advice. The Plan is unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to the impracticability of access.

**Cost of access to Blackwell Farm**

2.19 The transport costs of the proposed works to give access to Blackwell Farm have been understated in the Proposed Submission Plan. Some of the costs are listed in Appendix C of the Plan. The need to resolve consequential highways infrastructure requirements is identified in Policy A26 but not costed. Further requirements have been identified by RGP but not costed. The table below lists the main transport-related items.
<table>
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2.20 The need for interventions to address highway network performance issues which could otherwise result from the development is especially acute in the case of Blackwell Farm. Surrey County Council's *Options Growth Scenarios Transport Assessment Report*, January 2014, (to some extent overtaken by the Strategic Highway Assessment Report in June 2016) explains the likely highways effects of the various major urban developments proposed by Guildford BC (though the size of the Blackwell Farm scheme has been reduced since then from 2,250 to 1,800 dwellings). Blackwell Farm was 'Scenario 3', the sum of Scenario 2 - development of all permitted sites and three large developments just beyond the Borough’s boundaries - and the south-west Guildford urban development at Blackwell Farm itself. The Options study concluded that "When comparing scenarios 3 (south-west urban extension), 4 (north-east urban extension) and 5 (Wisley airfield development) to scenario 2, scenario 3 has the largest impact on general borough wide network statistics and scenario 4 the least" (paragraph 5.1.7). The 2016 SHAR did not conclude on the relative impacts of each major urban development.

2.21 The table above shows that the stated costs purely for access to the Blackwell Farm development (and associated through movement) amount to £60m. This is over £33,000 per dwelling In addition, there would be very serious additional highways costs to resolve the consequences of Blackwell Farm in the wider network beyond the site and to achieve the junction improvements with signalised lights around the Down Place access. Those are just the transport costs attributable to the development; in addition, Policy A26 refers to other supporting infrastructure including a two-form entry primary school, local retail centre, GP surgery, open space, playing fields and allotments. Secondary education is only not mentioned because a secondary school at the nearby proposed urban development at Flexford/ Normandy is expected to serve the Blackwell Farm development. Furthermore, 40% of the dwellings built will need to be affordable (Policy H2), largely cross-subsidised from the private open market housing for sale. All the usual gas, water, electricity and sewerage services would be needed, and typical contributions to local government services. The transport-related costs alone are far more than a development of 1,800 houses and 31,000m² of employment could realistically bear. Together with all the other infrastructure necessary to allow a new community to proceed, the scheme is undeliverable financially.

2.22 We conclude that Policy A26 on Blackwell Farm is not legally compliant because it has failed to have adequate regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed for the development to proceed; no regard at all has been had to a range of substantial The policy is also unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to very high infrastructure costs.

2.23 We recommend that the Blackwell Farm urban development proposal in Policy A26 is deleted on highways grounds.

**Impact on the Surrey Hills AONB and landscape**

*Direct impact on the AONB*

3.1 The proposed development at Blackwell Farm is the only major scheme in the Proposed Submission Plan which would directly affect the Surrey Hills. The built-up urban development is proposed in the setting of the AONB to the north...
of the Hogs Back, but the principal access road is proposed to cross the AONB in a highly intrusive manner, and the greatly expanded access at the A31/Down Place junction would also adversely affect the AONB.

3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs Back. The ridge of the AONB is at nearly 50m and the northern AONB boundary in the area at Om (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major development. As such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the "exceptional circumstances" required, nor can it be demonstrated to be in the public interest in view of the adverse effects.

3.4 The Proposed Submission Plan states as a requirement that "Primary vehicular access to the site allocation will be via the existing or realigned junction of the A31 and the Down Place access road, which will be signalised. The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV". The comment on the design of the road is as foolish as it is undeliverable. The existing access road is a beautiful country lane flanked by mature trees which is entirely typical of the AONB landscape. The first option, of 'improving' this 'sympathetically' to the standards needed by an access road for a new settlement (let alone to provide a Sustainable Movement Corridor to serve the Research Park, Hospital and other facilities), is impossible. The road is too narrow to be widened sufficiently and has a sharp bend near the bottom. This option could only be effected by the large scale removal of mature trees on one or both sides of the route, plus further damage on the lower slope to overcome the bend. Taking the substantial adjacent land beyond the paved highway itself, used in highway construction, would cause further major damage to the heavily treed landscape of the AONB in this location. This could not be 'sympathetic' to the AONB.

3.5 The second option, of a 'new adjacent parallel access road', would introduce an appalling scar onto the steep northern slope of the Hogs Back. It would irreparably damage this nationally known iconic landscape, and it is absurd for the Plan to suggest that this also could be designed 'sympathetically' to the AONB (and AGLV). An inevitable consequence of forcing a wide road down a steep slope at the angle proposed would be to require a near vertical wall of chalk on the ridge-side and other earthworks. This would be part of the unavoidable degradation to the AONB associated with the road, which will be visible and intrusive from miles around. There is also a real possibility that the access road would be accompanied by street lighting under either option, introducing a damaging night-time impact into this dark AONB landscape.

3.6 The Highways Authority has indicated to us that it will require street lighting at and around the new signalised junction on the top of the Hogs Back on the A31 in the vicinity of Down Place and Down. This would be damaging to the current night-time experience: lighting currently stops east of the A3/A31 interchange, with the A31 and the AONB to the west of this largely unlit. The change would give the clear impression that Guildford had spread outwards to the west and upwards to the highest point around the city.

3.7 The proposed road down the AONB scarp would damage views to the AONB from public rights of way to the north and north east as well as from Manor Park and from more distant viewpoints in and around the AONB. The construction of the road would itself greatly increase the damage to the experience of the AONB by introducing thousands of vehicle movements daily: this would force drivers and passengers to see and experience the visual damage done to this nationally important landscape, by the road they would be using.
3.8 In each of these respects, the proposed allocation at Blackwell Farm would run counter to the statement in the Plan's 'Spatial Vision' that "Areas of high environmental value such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest will be retained and afforded great New development on the edges of urban areas will be required to treat the transition from urban to rural character in a sympathetic way."

Impact on the setting of the AONB

3.9 The proposed urban development would be in the setting of the AONB to the north of the Hogs Back (and also north of but abutting the Area of Great Landscape Value). Only the access road to the A31 would be permitted on land to the south of this development. If, however, the secondary access road was aligned south of Manor Copse, then this too would pass through the AGLV.

3.10 Regard must be had to the setting of AONBs. Section 85(1) of the Countryside and Rights of Way Act 2000 states:"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving or enhancing the natural beauty of the area of outstanding natural beauty" (emphasis added). The Government’s Planning Practice Guidance draws attention to this obligation and specifically mentions proposals "which might have an impact on the setting of AONBs (Natural Environment paragraph reference ID 8-003-20140306)". The setting of AONBs is not protected as rigorously as land within AONBs, but various appeal decisions before and since the NPPF - which have rejected intrusive developments in the settings of AONBs - show that it continues to be relevant to decisions. In the absence of policy guidance, the formal position is that the weight to be given to setting is a matter for the decision-taker's discretion. NPPF paragraph 115 requires that in any decision "great weight should be given to conserving landscape and scenic beauty" in AONBs. In the context of paragraph 85 of the Act noted above, this applies not only to developments proposed within an AONB but proposed in its setting such that the AONB would be affected. This should be taken into account in plan preparation.

3.11 Both Guildford Borough Council's and Surrey County Council's Landscape Character Assessments (LCAs) identify the drama of the chalk ridge and the panoramic views, north and south, as defining characteristics of the Hogs Back. Both these LCAs also identify the significance of views to and from the ridge. The Guildford BC LCA Rural Urban Fringe Assessment of the Hogs Back references the importance of the land in providing "the setting to and views from Guildford" and the desire to maintain the "essentially undeveloped rural character" of the land. The assessment notes that: "The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change".

3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB: this is the setting of the Hogs Back, a nationally known and revered part of an AONB; the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change; the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs Back. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB's setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy PI: Surrey Hills Area of Outstanding Natural Beauty not least because it would fail "to conserve and/or enhance the setting and views of the AONB". The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.

The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012, from Alison Farmer Associates, which identified areas of search for possible extensions to the This included
the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (the final report is available from Karen Stevens) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

3.16 The LMS evaluation identified small scale character areas, one of which covered the eastern-most parts of the study area, adjacent to the built-up area of There were two parcels: one on Manor Farm (south and east of Manor Copse Ancient Woodland) and one north of Strawberry Grove Ancient Woodland. The latter comprises the north-east corner of the Policy A26 development allocation at Blackwell Farm. LMS recommended that both these parcels should not be included within the revised AONB boundary, but recommended that they remain open as the setting of Guildford and the AONB. LMS concluded here: "This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to [the AONB here] follows the western edge of this sub character area but includes Strawberry and Manor Copse. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west."

3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England's criteria for designating AONBs) shows that most of the Policy A26 Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality - in the setting of the current AONB - is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
- Appendix 4_Hogs Back Natural Beauty Evaluation_V2_24.05.16_1.pdf (6.0 MB)
- Appendix 3_20160704_ISSUE.PDF (2.4 MB)
- Response_to_GBC_Reg19_cons_by_SaveHogsBack_CPRESurrey_Final_Redacted.pdf (875 KB)

Comment ID: PSLPS16/3315  Respondent: 9332193 / Save the Hogs Back Campaign  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Conclusions

3.19 We consider that the Blackwell Farm development allocation should be removed by deleting Policy A26 because of its impact on the AONB:

- there would be a significant direct impact of the primary access road on the AONB;
- the primary access road through the AONB would be major development in its own right, and the proposals do not fulfil the criteria for allowing such development;
- the proposed built development and part of the primary access road would have a significant adverse effect on the setting of the AONB;
- the signalled junction to the primary access road, where Down Place joins the A31 on the top of the Hogs Back, would be lit at night, which would damage the appreciation of the rural qualities of the AONB at night and emphasise the sprawl of Guildford into it;
- the primary access road from the Blackwell Farm development to the Hogs Back ridge would probably be lit at night, which would also damage the appreciation of the rural qualities of the AONB and emphasise the sprawl of Guildford into it; most of the proposed development site should be included within a revised boundary of the Surrey Hills AONB, while its north-east corner (north of Strawberry Grove Ancient Woodland) would be in the immediate setting of the AONB and should be kept free of development as a buffer between urban Guildford (the research park) and the AONB.

3.20 We conclude that the Plan is unsound because the proposal to promote development at Blackwell Farm in the Surrey Hills Area of Outstanding Natural Beauty and within its setting is not consistent with Government policy. Insufficient regard has been had to the impact of the primary access road on the AONB (and which we also regard as major development). Insufficient regard has also been had to the primary access road on the setting of the AONB none at all to the impact of the urban development area on the setting of the AONB. In that last respect we consider there has been a legal failure to comply with the Planning and Compulsory Purchase Act 2004, s19(2)(a).

Green Belt at Blackwell Farm

4.1 Paragraph 83 of the NPPF states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." This is a continuation in principle of previous Green Belt policy (from PPG2, paragraph 9).

4.2 In the most recent review of the Guildford Local Plan, following the report of the Inspector in September 2001, there was just one change to the Green Belt. This was to allow the expansion of the University of Surrey (and two minor adjacent plots) into Manor Farm (the Manor Park development). It is a further withdrawal of the Green Belt boundary to allow more development immediately beyond the last land release that is proposed now. The Local Plan Inspector in 2001 was alert to the risk of nibbling away at the Green Belt and responded as follows to objectors who sought a more limited release of land from the Green Belt: "the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of undesignated land for future requirements, where they are reasonably foreseeable, can be accepted where it can avoid a succession of bites at the Green Belt" (paragraph 16.4.3).

4.3 The Borough Council and the University of Surrey are attempting to undermine this intention. The Local Plan was adopted in 2003, yet even when the Issues and Options report for the current Local Plan was issued in 2013, they were trying to release further land from the Green Belt in precisely the way the Inspector had been trying to Save Hogs Back and CPRE Surrey are appalled at this attempt to abuse and undermine Green Belt policy and principles. The proposal reflects a remarkably casual approach to the Green Belt which should not be tolerated. Further removal of land from the Green Belt at a location where Green Belt land has only recently been released is contrary to the expectations of Government planning policy and the Plan therefore unsound.

4.4 There should be no illusion about the University of Surrey's desire to develop a huge swathe of land west of Manor Park at the foot of the Hogs Back. In November 2013 the University released its proposals for a 'Garden Neighbourhood' stretching as far west as Flexford House and occupying the whole area between the AONB and the railway beside Wood
Street Village. An illustrative page from the proposals is attached as Appendix 1. This shows comprehensive development of the area, a new junction on the A31 and a road straight down the steep northern slope of the Hogs Back. The development of Blackwell Farm would only be a stepping stone in this expansionist thinking of the University which shows a serious lack of appreciation of the role of Green Belt, the Hogs Back and the Surrey Hills AONB. Releasing Blackwell Farm is highly undesirable in its own terms and would only fuel the desire of the University to press the Council for yet more land releases in future.

4.5 The Proposed Submission Local Plan has adopted "a controlled realignment of the Green Belt boundary and development of a small number of strategic sites, which will allow us to provide for mixed and inclusive communities supported by new infrastructure" (paragraph 28). The Plan is a coy as it possibly can be about the remarkable scale of Green Belt land release for housing which it proposes. Large urban developments are proposed in the Green Belt at Blackwell Farm (1,800 houses), Gosden Hill Farm (2,000 houses), former Wisley Airfield (2,000 houses) and between Normandy and Flexford (1,100 houses). Various Green Belt sites offering over 100 houses each are also proposed.

4.6 The Government policy on Green Belt in the NPPF begins with a statement of great clarity, but one which the Proposed Submission Plan appears to have neglected or sidelined: "The Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" (paragraph 79). The NPPF does of course also provide considerable encouragement to the provision of the housing which the nation needs. It explains how the conflict is to be dealt with between the pressure of housing and the constraint of Green Belt (and other nationally important designations) at paragraph 14: "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless... specific policies in this Framework indicate development should be restricted". One such policy (footnote 9) is Green Belt.

4.7 For the avoidance of doubt, the Government has issued various statements confirming its commitment to Green Belt and reiterating how the pressure to release Green Belt land should be addressed in local Plans. For example, Brandon Lewis MP, Minister for Housing and Planning, told a Westminster Hall debate on 15 March 2016:

"...we have regularly made the point that the green belt is a legitimate constraint. It is an important part of the country's infrastructure and the Government attach the highest importance to its protection. In fact, over the past few years we have increased it. The NPPF makes it clear that green belt boundaries should be established in local plans and can be altered only in exceptional circumstances, using the local plan's process of consultation and independent examination. The Government do not specify what constitutes exceptional circumstances, as it is for each local authority to determine that and how much weight to attach to those circumstances" (Hansard column 307WH).

On 11 January 2016 Mr Lewis gave a written answer to a Parliamentary Question by Mr Laurence Robertson MP (Tewkesbury), as follows:

Green Belt Question 21089

To ask the Secretary of State for Communities and Local Government, what his policy is on the priority that should be given to maintaining Green Belt land in Local Plans in areas where there is unmet housing need.

Answer Green Belt is protected by local authorities in line with national policy set out in the National Planning Policy Framework. The Framework states that permanence is an essential characteristic of Green Belt, and that a Green Belt boundary may be altered only in exceptional circumstances, using the Local Plan. Our supporting Guidance reminds local authorities that, in planning to meet their objectively assessed local housing needs, they must have due regard to national policies (including Green Belt policy) which indicate that development should be restricted and which may restrain the ability of an authority to meet all its needs. This applies even where there is no up-to-date Plan. It is for the Planning Inspector examining a revised local Plan to determine whether it is based on sound evidence and in line with national policy.

A statement to Planning from OCLG reported on 25th April (attached as Appendix 2) said:

"There are no plans or policy to relax the strong protections that prevent inappropriate development on the green belt. Ministers have repeatedly been clear that demand for housing alone will not justify changing green belt boundaries."
In our view, the statements from the Government clarify that releasing land from the Green Belt to meet housing needs is an option but is only to be undertaken in exceptional circumstances rather than lightly. Guildford Borough Council, in contrast, has chosen to meet all its Objectively Assessed Need for housing, taking whatever land is necessary from the Green Belt to secure this. Furthermore, the Proposed Submission Plan has made no real effort at all to justify the release of land from the Green Belt in the terms set by the NPPF. Paragraph 4.3.16 of the Plan simply states:

"National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development."

Claiming 'exceptional circumstances' is easy. However, there is no review of the arguments needed to demonstrate that exceptional circumstances might apply at any location in the Borough. In our view, this means that the Plan is unsound by virtue of not being consistent with Government policy, and also unlawful because it has failed to have regard to national policies and advice on Green Belt contained in guidance issued by the Secretary of State.

The purposes of Green Belt have played remarkably little part in the selection of areas for urban development in the Proposed Submission Plan. Pegasus Group for the Borough Council divided all non-urban land in the Borough into a series of large plots for analysis. Their most up-to-date analysis is given in their Green Belt and Countryside Study, Volume II Addendum Appendix 1, April 2014. This assumes that the Green Belt purpose of encouraging urban land recycling applies equally to all plots, but the other four purposes are assessed for each plot. If none or one purpose is served by the plot it is ranked as low sensitivity, two purposes is ranked as medium sensitivity and three or four purposes is ranked as high sensitivity. 41 plots in the Green Belt are identified as having low sensitivity, 67 as having medium sensitivity and 91 as having high sensitivity. Of the four major proposed urban developments noted in paragraph 4.1 above, three have medium sensitivity and one (Flexford/Normandy) has high sensitivity. It is striking that none of the plots having low sensitivity was chosen for development. The choice of sites for development was clearly not significantly influenced by suitability of sites in Green Belt terms.

Pegasus Group explains its approach to recommending 'Potential Development Areas' (PDAs) in its Volume II Addendum at paragraph 3.7:

"Volume II of the Study has focussed upon those parcels which directly adjoin the urban edge as they are likely to offer a more appropriate relationship with the main urban area than those parcels which are separate from it. It is recognised that if the Council do identify urban edge parcels as appropriate for development and removal from the Green Belt, this may offer the potential for some adjoining land parcels which do not currently connect with the urban edge to come forward in a more appropriate manner. However, such decisions will be best informed by the Council's chosen spatial strategy, and choices upon the recommended PDAs around the urban edge set out in Volume II and this Addendum."

In practice, the Borough Council did not accept this approach: two of the four main areas proposed for major development are essentially free-standing urban areas in the countryside, at Wisley Airfield and Flexford/Normandy. If these sites were considered suitable by the Council, then it should also have revisited the 41 plots previously identified as low sensitivity in Green Belt terms before deciding which to allocate.

We are not arguing that the choice of major development sites was random, but that Green Belt policy played hardly any part in the selection. On not a single occasion is a Green Belt plot retained free of development 'because it significantly fulfils Green Belt purposes'. Nor is a Green Belt plot proposed for release 'because it has little benefit in fulfilling Green Belt purposes'. We consider that the Borough Council has fallen far short of being able to demonstrate exceptional circumstances to justify any of its choices of major development area in Green Belt terms. That is a major failure of policy implementation and, in our view, makes the selection of sites unsound as (i) contrary to national planning policy and (ii) not the most appropriate strategy when considered against its reasonable alternatives.

In reality, Pegasus Group has emphasised a range of non-Green Belt planning issues which it considers important, including a highly selective 'sustainability assessment scoring' system which is dominated by walking distances. No doubt informed by this, there are important deficiencies in the Borough Council's approach when considering the possibility of releasing Blackwell Farm for development. Policy A26 refers to 'key considerations' merely as "AONB, AGLV, ..."
Access, Surface water flood risk”. There is much else at stake, and no justification for changing the existing Green Belt boundary to the newly proposed one.

1. The protection of Ancient Woodland has been given little attention by Pegasus Group or the Although there is no formal proposal to fell Ancient Woodland at Blackwell Farm, the presence of Strawberry Grove, Manor Copse and Wildfield Copse immediately adjacent to the proposed development area will compromise these irreplaceable natural assets as the residents of 1,800 houses seek nearby leisure and recreation. It appears that zero weight has been given to the real impact on Ancient Woodlands and ancient hedgerows. The proposed allocation can be expected to cause the degradation of the Ancient Woodlands to the extent that over a period of time they lose much of their biological and historic interest.

2. The Pegasus Group study refers to development within landscape designations but omits review of the impact of development on the setting of the Surrey Hills This is a major omission which we have attempted to rectify in paragraphs 3.9-13 above. Reference is made to landscape character but not to visual impact: the latter is an important consideration in close proximity to the Hogs Back and therefore an important omission in relation to Blackwell Farm.

3. The Pegasus Group study assumed that Purpose 5 of the Green Belt "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" (NPPF paragraph 80) applied equally everywhere. We think not. The Blackwell Farm site is capable of achieving far more by way of concentration of land uses than most other sites. This is because the whole of the Blackwell Farm site is owned by the University of Surrey, as is all the land to the east. One effect of stopping development on Blackwell Farm would be to oblige the University to pay more attention to the efficient use of its land. At present the University takes a relaxed approach to land supply:

- the University has devoted large areas to inefficient surface-level car parks (view this on Google Earth, for example);
- the Research Park is specifically advertised as a 'low density rural location' (see the video spool on www.surrey-research-park.com/), and provides just 65,000m² of office space across 28.33 hectares;
- the Guildford Local Plan Inspector's Report in 2001 agreed to remove over 60 hectares of land from the Green Belt at Manor Park for University purposes, immediately east of Blackwell Farm, which has given the University an impression that land supply is not an issue; the Inspector commented "It may be that, as many Objectors felt, the Proposal is being overgenerous in the amount of land that is being taken out of the Green Belt and that this could be cut back. I have sympathy with that view" - though he still released the land for the reasons he gave in paragraph 16.10.2.

(iv) There is no Green Belt boundary available on Blackwell Farm which would be reliably permanent. The NPPF states that when Local Plans review Green Belt boundaries local planning authorities should "define boundaries clearly, using physical features which are readily recognisable and likely to be permanent" (paragraph 85). The Council's proposed western boundary to the site - the new Green Belt boundary - would follow a hedge in a dip in the landscape. The existing Green Belt boundary is superior and there is a clear risk from the proposals that Guildford could in future sprawl further west of Blackwell Farm on the basis that the boundary proposed now is indefensible.

4.13 On all these grounds the existing Green Belt boundary has superior merit to the one now proposed further west.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3397</th>
<th>Respondent: 9332193 / Save the Hogs Back Campaign</th>
<th>Agent: Green Balance</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate into the town despite its physical proximity. There are many facets to this, the main ones being:

   - the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster the strategic route in and out of Guildford, and the possibility of this happening is unknown;
   - movement between the development area and Guildford, which is already extremely congested, would be substantially more impeded by the development;
   - alternative means of access to the development area would have both significant practical problems and significant adverse consequences for the highway network;
   - the ‘Sustainable Movement Corridor’ to tackle that congestion is most unlikely to be effective on the scale necessary to resolve access issues and will fail in its key role of reducing congestion;
   - the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still further above legal limits at the most polluted point in the Borough.

In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

Traffic generation in relation to road capacity

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that there are significant limitations in the evidence presented in the Strategic Highways Assessment Report (SHAR) accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

   - the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
   - the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.
4. The SHAR indicated that the total vehicle generation anticipated by the whole Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

5. The Local Plan 2016 identified that a “Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue”. The word ‘preferably’ is instructive because it indicates that it was unclear in June 2016 how Blackwell Farm would be connected into Guildford. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. On the assumption that a means of direct access would be found, the SHAR identified distribution of Blackwell Farm traffic to the network of 342 trips eastbound towards Guildford and 375 trips southbound to the A31 in the morning weekday peak hour.

6. Figure 4.3 of the SHAR estimates traffic on the principal arms of the local network with Blackwell Farm development in place including the link to the A31. This Figure shows that 1,803 vehicles would attempt to enter the Egerton Road/Gill Avenue crossroads by the Hospital in the peak morning weekday hour (one every two seconds). The 342 eastbound vehicles generated by the Blackwell Farm development would account for 19% of the post-scheme traffic on the junction (23% growth on pre-scheme traffic), neglecting the impact of any rat-running traffic. Users of the road would consider this scale of traffic growth implausible and unacceptable given the high level of congestion there at present. The SHAR confirms that the level of congestion on Egerton Road in the morning peak will be substantially worse than at present and will exceed its capacity with the development and its access roads in place (Scenario 3). Table 4.4 (Row 25) shows that Egerton Road eastbound will have a ratio of flow to capacity (RFC) of 0.92 resulting in a level of service with ‘unstable flow operating at capacity’. Table 4.12 (Row 8) shows that Egerton Road westbound will have a RFC of 1.21 (compared with about 1.04 now) resulting in the worst possible level of service with ‘forced or breakdown of flow’. In other words, it simply won’t work. The figures already smooth the morning peak hour figures over a three hour average, as Mouchel noted, so actual congestion in the peak would be worse than these indicators, even assuming zero rat-running traffic.

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.

8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

- the proposed link with the A31 has been downgraded from its ‘primary’ status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;
- a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;
• proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;

• the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to the local road network necessitated by the scheme, but this must now have “regard to the Sustainable Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft, the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;

• the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event from development planned or under construction at Manor Park and at the existing Research Park.

Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup Guildford Town and Approaches Movement Study, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use for local movements. The study recommended:

“Interventions in this strategy that reduce roadspace in the town centre should serve to deter through traffic in the town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town:

“In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity, including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the 2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and severance. These interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”

12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The June 2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the [DfT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe…. To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).
13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision states:

“The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 ‘Supporting the DfT’s “Road Investment Strategy”’ as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):
• A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see Topic Paper: Transport paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise”. This is said to be because an SoCG is likely to be agreed closer to the Examination (Topic Paper: Transport paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period.” A Technical Note supporting that submission, prepared by Mouchel, was more precise:

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England’s letter on 5 October 2016 doing this stated instead (with our emphasis added):

“You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme.

We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our
recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy.”

19. While Highways England is urging caution, Guildford’s Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be ‘delivered’ between 2023 and 2027. This conflicts with paragraph 4.6.14 of the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council’s own Topic Paper: Transport at paragraph 5.88, which reports that “Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years.” This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan’s aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be ‘Highways England and developer funded’ instead of ‘Highways England and developer contributions’.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

“4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.”

22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:

- if a suitable widening scheme can be designed and if so how much it would cost;
- whether the scheme would meet ‘value for money’ tests;
- whether the money for it could be found;
- whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later).

Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council’s reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be
constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:  
- 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ....pdf (210 KB)  
- 2017-06-28 TN02.pdf (254 KB)

Comment ID: pslp172/3408  
Respondent: 9332193 / Save the Hogs Back Campaign  
Agent: Green Balance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Access from the A31 Hogs Back

Junction with the A31

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council’s Strategic Highway Assessment Report June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. It shows too an extra westbound lane for traffic on the A3 over-bridge but no bridge widening. Further proposals exist for this junction but have been denied to Save Hogs Back on weak excuses. Also, there appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.

26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.

- There does not appear to be sufficient road width for the proposed junction.
- A signalled junction is likely to be over-capacity at peak periods.
- Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
- Widening of the A3 over-bridge may well still be necessary at vast cost.
Access road between the A31 and Blackwell Farm

27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an “improved Down Place access road”, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park and its proposed extension to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don’t really need to be there. There appear to be two intentions: to constrain drivers who are just passing through – so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) – and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicability of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council’s Topic Paper: Transport (June 2017) and Strategic Highway Assessment Report Addendum (June 2017), and is restated but not explained in Guildford Borough Transport Strategy 2017 (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not ‘authorised’ to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of ‘legitimate’ drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing
development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration would become very large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Councils notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:

1. Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?
2. Will Surrey Police provide the enforcement of the ANPR in perpetuity?
3. How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roadspace to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

Impact of the link road on air quality in Compton

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/m3) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: ‘Scenario 3’ involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm) and local highway schemes, while ‘Scenario 5’ involves the widening of the A3 at Guildford (A320 Stoke interchange junction.
to A31 Hog’s Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.

39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: ‘Unstable flow operating at capacity’. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan’s proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an *Air Quality Review of Guildford Borough proposed Submission Local Plan: Strategy and Sites “June 2017”*, but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that “A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations”, but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO2 pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”
Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

42. Aecom’s recommendations in section 5.4 recognise that “The increase in traffic flows associated with the implementation of the Draft Local Plan are predicted to be in the region of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes “Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

**Connection to Guildford**

**Linking the Research Park Extension to the road network**

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park proposal is for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straightforward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and parallel to the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue, apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided). So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.
46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

**Linking Blackwell Farm to Egerton Road and the Tesco roundabout**

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26, remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be derelict in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified first.

**Impact of Blackwell Farm and the Research Park development on the local road network**

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.

49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as
may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeably dire that we strongly recommend the Blackwell Farm development should not be taken forward.

**Sustainable Movement Corridor**

51. Back in 2014 Arup prepared a report *Guildford Town and Approaches Movement Study* for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’. ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a Progress Update on the Sustainable Movement Corridor scheme (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadway with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was “to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.” Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).

53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a ‘worst case’ in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that “the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034”. However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues “we forecast that there will also be an absolute increase in overall traffic volumes.” Instead the paragraph proposes to ‘increase highway capacity’. This is a downgrading from the
intentions just a year ago, when paragraph 4.1.8 of the SHAR stated “The impact of these sustainable transport schemes is expected to be significant”. What, therefore, is the Council’s objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed Submission Local Plan together with the main transport documents supporting it (the Guildford Borough Transport Strategy 2017 and Topic Paper: Transport, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the 2017 Update document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the 2017 Sustainable Movement Corridor – Update, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at all; a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last
year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:

- Project BT6 ‘Significant bus network serving the Blackwell Farm site and key destinations including the existing western suburbs of Guildford and the town centre to be provided’ is a new requirement in 2017, which must be entirely funded and delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment at present;
- Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which is likely to increase financial obligations on the developer;
- A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance now that the station merits its own Policy A59 (see paragraphs 63-64 below);
- The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and Local Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The Blackwell Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per dwelling. There will be other major costs which the developer will be required to fund, including new primary and secondary schools and affordable housing (none of which were included in our previous costings), all of which can be very expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that the proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm scheme would have to fail and be deleted from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>pslp172/3409</td>
<td>9332193 / Save the Hogs Back Campaign</td>
<td>Green Balance</td>
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| Document | Proposed Submission Local Plan: strategy and sites 2017 / Policy A59 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1638  Respondent: 9332193 / Save the Hogs Back Campaign  Agent:  Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:

• constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
• major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;
• taking land for major development which ought to be included within the AONB and has a real prospect of being so included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016.

69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/304  Respondent: 9332193 / Save the Hogs Back Campaign  Agent: Green Balance


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

(1) The Plan is not consistent with national policy, in the following respect:

• Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to…. unacceptable levels of…. air…. pollution”.

(2) The Plan will not be effective, in the following respects:

• Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.

• Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.

• Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.

• Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.
• Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
• Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

• Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
• Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As it stands today, the current infrastructure cannot cope with the existing population, particularly the road network. Worplesdon Parish as example is often gridlocked and any additional housing would make matters worse causing further pollution as well as more delays and cost to Commerce and Industry. Likewise Water and Sewage is a problem and again The Proposed Local Plan does not seem to deal with this?

Without major changes to our roads and plans to upgrade utilities and flooding defences, I object to any further building in Worplesdon Parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

GBC Councillors were elected at the last election on the basis of keeping the Greenbelt free from development -

"Party promises to protect the Green Belt and focus new development on Brown Field sites following public consultation and residents’ views. Anne Milton and Guildford Conservatives — Good Government for Guildford Conservatives in Guildford have listened to residents’ concerns about Green Belt development. Every Council must go through a Local Plan process, setting out how it will meet the need for housing during the next decade. Initially the Government demands that all options be considered. But following a thorough public consultation, it is clear that Guildford wants to keep its green spaces and Green Belt. That is why the Conservative Party is pledging to focus on providing new homes on Brown Field sites. Development on Merrow Downs and Pewley Hill have been ruled out. Plans at Blackwell Farm and Fairlands are strongly opposed by local Conservative candidates."

......... and yet this is not the case.

Brownfield sites seem to have been ignored in the Proposed Submission with further destruction of the Greenbelt and I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/2046  Respondent: 9332545 / John Chalmers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All in all, I feel let down by the proposed submission and hopefully major alterations will be made prior to it being presented for inspection particularly with the uncertainty that Brexit now brings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2045  Respondent: 9332545 / John Chalmers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I had hoped that the new Council would consult (meet and listen) to residents before presenting this proposal but it appears that they have not even met with Parish Councils which again is at odds with how this will be seen by the Planning Inspectorate and all at a great cost to the taxpayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5938  Respondent: 9334177 / Don Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object most strongly to the proposed development of land between the railway and the Guildford to Aldershot road in Normandy (site A46 Normandy/Flexford).

This proposal to build on this Green Belt land, which provides valuable separation between the communities of Flexford and Normandy, is to be developer lead, with the ‘sweetener’ offered by the developer being the proposal to build a new secondary school.

There is no proven need for a school on this site as other local schools are under-subscribed and the building of such a school neither outweighs the harm done to this valuable Green Belt land nor provides ‘exceptional circumstances’ to permit development on this Green Belt. There are no grounds to raise funding to build a school from the sale of Green Belt land.

The building of a school and the building of 1100 dwellings are two separate issues. Without the homes being built the school will be an additional, under-subscribed, school and there is no need for the school without the homes being built.

I have additional concerns about road access, traffic, particularly at the A31 junction and the Aldershot road, and the road and railway bridges. The infrastructure is incapable of supporting a development of this size.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>Respondent: 9334785 / Carol Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
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The Clandons have many historical and interesting buildings, many listed and the scale of development is just not appropriate within this area.

Likewise the countryside will be spoilt with all this proposed extra development.

I object to East Clandon being deemed a settlement area and the settlement area being extended in West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We need a LOW COST housing scheme in all small villages to encourage young people to settle or be able to stay in the community where they grew up. I would see no problem whatsoever with each village in the Borough having to provide LOW COST housing – say 20 houses per village. This would be sustainable and would certainly meet the housing needs within the Borough over the next 20 odd years or so.

I object most strongly to the traffic congestion any additional development will cause to our local villages due to inadequate road infrastructure (Policy11). As it is now, whenever there is a traffic accident on the A3 or M25, vehicles try to cut through all the local roads (at speed quite often) which results in major congestion and danger through all the small villages in the area. The A3 is at a standstill daily heading north to London and south at Stag Hill and that is without any additional development within the area.

I object to the developments proposed at Garlick’s Arch, Wisley Airfield, Gosden Hill and Clandon Golf Course I object to the lack of proper infrastructure planning for those sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I avidly object to not protecting the Green Belt (Policy P2) The Green Belt is there to protect our green open spaces for future generations to enjoy as we have done over the years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10750  Respondent: 9334785 / Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all development in areas at risk from flooding (Policy P4) Any development carried out in or around the Clandons, which are renowned for their water meadows will add to the flooding, which so often occurs in the Wey and Mid Thames Valleys and any additional large developments will just add to the misery for those who live in those areas. The Government has cancelled the flood relief programme for the Mid Thames area a few years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10743  Respondent: 9334785 / Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non bias report. (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10746  Respondent: 9334785 / Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is extremely doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit. I therefore object to the Brough Wide Strategy (Policy S2) . National Planning Policy promotes sustainable development, which this local plan lacks.

What is driving the need for housing in and around the villages of Guildford? I suspect it is the greed of our Borough Council to build more business premises and attract more people to live in the area, which is ludicrous as the road infrastructure is overloaded as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5271  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

I OBJECT on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5272  Respondent: 9335041 / David Reeve  Agent:
I OBJECT on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

I OBJECT that this proposed development actually borders on the AONB, which makes a complete mockery of the designation. It is also exceptionally disturbing to find that there appears to have been a deliberate effort to remove Blackwell Farm from consideration of a boundary review of the AONB.

I OBJECT on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

Finally, I STRONGLY OBJECT that Guildford proposes to wreck the view of a nationally known landmark in the form of the Hog’s Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I ACCEPT that this site could be allowable subject to:

- The design and scale being acceptable.
- Its footprint is no larger (and in the same place as) the current footprint.
- The hotel façade being preserved.
- A comprehensive review to establish whether the borough should be losing a country hotel (bearing in mind the provisions of Policy E6).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5276  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I ACCEPT that this brownfield site would be acceptable as a site for residential development (subject to application details).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5277  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A38: Land at Manor Farm, West Horsley

**I OBJECT** on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5278  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A39: Land near Horsley Railway Station, East Horsley

**I OBJECT** on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

**I OBJECT** on the grounds that approximately one third of this site is in Flood Zone 3.

**I OBJECT** on the grounds that the access to this site would have non-complaint visibility splays and that the impact on local traffic would be excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5279  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A40: land at Waterloo Farm, West Horsley

**I OBJECT** on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5280  Respondent: 9335041 / David Reeve  Agent:
Policy A41: Land to the South of East Lane, West Horsley

I OBJECT on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

I STRONGLY OBJECT on the grounds that the boundary of this site totally fails to comply with the defensible boundary requirements set out in NPPF paragraph 85, and in the Green Belt and Countryside Study.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5281  Respondent: 9335041 / David Reeve  Agent:

Policy A43 & A43a: Garlick’s Arch & Slip Roads, Burnt Common

I OBJECT on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

I OBJECT on the grounds that the Strategic Traffic Assessment for the slip roads associated with this site fails to provide credible data on the traffic impacts on the A247 through West Clandon and Send.

I OBJECT on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10651  Respondent: 9335041 / David Reeve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2: Sustainable Design, Construction and Energy

I ACCEPT this policy as far as it goes, but it needs some extension.

It is important to include a specific comment that the higher initial construction cost of energy efficient homes will not be allowable as a grounds for viability waivers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10652  Respondent: 9335041 / David Reeve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: Development in Urban Areas and Inset Villages

Paragraph 86 of the NPPF sets out the principles by which it should be decided whether villages are to be inset or not, and that issue is covered in my response to Policy P2 above.

However, there is a consideration in connection with this Policy D4 that appears to have been missed. Villages that are currently proposed for insetting, have been subject to Green Belt protection for very many years, and as a result they exhibit a character that is altogether different from urban areas, and from other non-Green Belt settlements. NPPF 86 recognises that having been inset, the character of a villages still needs to be protected, and it suggests that “other means should be used, such as conservation area or normal development management policies”. Given that inset villages exhibit a specific character as a result of their former Green Belt protection, it is clearly appropriate to consider formally whether they should be reviewed in terms of extending their conservation areas and/or instituting specific development management policies that cater for this particular situation. I can find no indication that such options have been considered, but clearly this needs to be done otherwise the character of former Green Belt villages will be irrevocably degraded. I therefore OBJECT to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10639  Respondent: 9335041 / David Reeve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Sustainable Employment

I OBJECT to this policy on the basis that it has been developed on the same data on economic growth that has been called into question in respect of the SHMA. It needs to be thoroughly reviewed before this policy is considered seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10641  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2: Location for New Employment Floorspace

I OBJECT to this policy on the following grounds:

- Allowing new office and research and development (use Class B1a and B1b) floorspace to be developed within 500m of Horsley station is out of keeping with the existing neighbourhood, and would adversely change the character of the area.
- The proposed expansion of the Research Park onto Blackwell Farm is premature. It is unacceptable to undertake further development on high quality greenfield land while the density of the existing development is relatively low, and while a significant area of the Park is absorbed by surface car parking (as is also the case on a significant area of the main University of Surrey Campus).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10642  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E3: Maintaining Employment Capacity and Improving Employment Floorspace

The key to this policy is the location of the premises that are proposed for conversion to residential uses, and it is not possible to support or to object to this policy without reference to those locations. I therefore question whether the policy is properly drafted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy E4: Surrey Research Park

I OBJECT to the inclusion of use class B1c (light industrial) on the Research Park. Moreover, the inclusion of use class B1a (offices) should be strongly discouraged in favour of the real purpose of the Park, namely use class B1b (research and development of products and processes). General growth as a standard business park does not comply with the original purpose of the Research Park, and is certainly does not justify new development on the high quality greenfield site that is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy E5: Rural Economy

I OBJECT to the unfettered opportunity to bring town centre uses into the rural areas. Some may be perfectly acceptable, but others definitely will not. It should be possible to re-draft this policy more specifically in terms of (a) the uses that are allowed (and those that are not), and (b) the particular locations where allowable uses might be permitted. Finally, there should be safeguards so that residents’ views are fully taken into account if such uses are proposed in rural areas.

Redrafting of this nature is required before residents can pass sensible judgement on this policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6: The Leisure and Visitor Experience

The problem with this policy is one of drafting. One person’s “high quality visitor experience” is another person’s nightmare – as was borne out by the strong adverse response to Surrey County Council’s proposals for changes at Newlands Corner. Without considerably more detail it is not possible to either agree or disagree with this policy. It will be important to consult residents on applications under this general area, and this should be included in the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre

The first half of this policy sounds like advertising copy, and does not belong in a planning policy.

The key things that will govern the success or otherwise of this policy are:

- Controlling (and reversing) the growth traffic in the town centre, and planning for more pedestrianisation.
- Recognising that the traditional model of retail has undergone great change in the recent past, and that it will continue to do so.
- Making people feel safe in the evenings. While the growth of the night time economy has certainly been popular amongst the young (and those businesses that serve them), there are growing numbers of people who feel less secure in Guildford at night that they did twenty five years ago.
• Identifying and building upon the key factors about Guildford that act as a draw, rather than trying to compete head-to-head with other established retail centres that trade on a “volume offering”.

It is far from clear that this policy has struck the right balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/10649  Respondent:  9335041 / David Reeve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Policy E8: District Centres

I OBJECT to this policy. There appears to be a complete disjoint between the views of residents and planners. While residents of Ripley and of East Horsley appreciate their local shopping facilities, I suspect that relatively few of them would draw any real distinction between what the draft Local Plan calls District Centres and Local Centres. Most households in both these villages would certainly do their main shopping in major supermarkets in Cobham or Burpham rather than in their “District Centre”. The distinction between District Centres and Local Centres is therefore illusory, and is not helpful in planning terms. Indeed, the Settlement Hierarchy that sought to classify settlements by the facilities that they offered was comprehensively discredited in 2013-14, and now appears to have been downplayed to the point of invisibility in the current round of consultation.

It’s time to face reality, do away with nominal distinctions, and either re-write Policies E8 and E9 from scratch as a single sensible policy, or perhaps draw the distinction instead between village centres and urban centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/10632  Respondent:  9335041 / David Reeve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Policy H1: Homes for All

I OBJECT to this policy on the following grounds:

The “Reasoned Justification” in Section 4.2.18 of the Plan states (my emphasis added): “To minimise the pressure on the existing housing stock it is important that any significant increase in full time student numbers is matched by the provision of purpose built student accommodation. The University of Surrey projects a significant growth in student numbers over the plan period and it is therefore required to accommodate a proportion of student bedspaces in halls of residence or purpose built student accommodation on campus, as set out in the most up to date Strategic Housing Market Assessment. This will enable the University of Surrey to grow at a sustainable rate whilst minimising the impact on the local housing market.”

However, the Policy itself states that “We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus”, which is inconsistent with Justification. Given this inconsistency, and the disproportionate effect that growth in student numbers has had on the housing situation in Guildford, a considerably greater proportion of any future growth in student numbers should be accommodated in University accommodation on the campus – I recommend a minimum of 85%. I believe that under similar circumstances the University of Oxford has recently planned for all future student expansion to be on its own land rather than competing directly with the local non-University demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10633  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable Homes

I have sympathy with the sentiment of this policy, but I OBJECT to the notion that an increase in housing provision will have the desired effect. In its practical effects this policy is most unlikely to resolve the major problem facing many families or young people wishing to find a home (for purchase or rent) in Guildford – namely affordability.

Guildford is an expensive town in an expensive region within easy commuting distance from London, one of the most expensive cities in the world. No practicable degree of growth in local housing supply will result in lower prices; there is an effectively inexhaustible supply of buyers with sufficient funds to outbid a large proportion (almost certainly a large majority) of families and young people in the housing market. Moreover, the relatively buoyant buy-to-let market (stimulated in part by student demand) means that market rents remain high and out of reach to many renters without the assistance of housing benefit. Indeed, this same point was made by Edge Analytics in paragraph 3.6 of their Draft Strategic Housing Market Assessment – A Review, March 2014, in which they stated that “Whilst it is evident that Guildford Borough has a particularly acute affordability issue, it is less clear how an upwards adjustment to housing provision would manifest itself as an improvement to the affordability position.”

In practice this problem cannot be solved by a Local Authority by increasing the supply of affordable homes (ie. by definition 80% of the market price). It can only be addressed by a consistent, long-term, national policy that would include
an increase in the provision of social housing (ie. council housing) and potentially a degree of rent control in addition to an increased supply of housing.

In the absence of such a national policy (and the political will to sustain it in the long term), a misguided attempt to greatly expand housing provision in Guildford would simply put additional pressure on development in both urban and rural areas of the borough, on traffic congestion and on other infrastructure, and would not address the fundamental problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10634  Respondent: 9335041 / David Reeve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3: Rural Exception Homes

I OBJECT that this policy is an attempt to address the affordability problem in the wrong way. As stated under the objection to Policy H2 above, there is no point in attempting to apply supply side solutions in a situation where demand is essentially unlimited. While I have great sympathy for families struggling to find a home (either rented or purchased) at a price they can afford, it is an illusion that policies such as this will solve the problem. If the Council really wants to address the issues identified in Policies H2 and H3, it should turn its attentions to lobbying central government, because no affordable interventions that it might seek locally will have any appreciable impact on the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10655  Respondent: 9335041 / David Reeve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and Delivery

On reading this policy it sounds OK. But, the reality of this Local Plan is that despite its statement that “infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development” many of the proposed developments will not in fact deliver infrastructure at the time that it is needed. Schools, medical facilities, road improvements, parking etc. are all likely to be delivered (if at all) well after they are first
needed. Agreements can be made with developers that, for example, a school will be available for use after 500 dwellings have been built. Under those circumstances, it is not uncommon that the houses are built in phases, and – by an amazing coincidence – there is a pause after 499 houses have been completed.

The only way to know in advance how infrastructure delivery is going to pan out is to have a genuinely detailed plan for infrastructure that covers specifications, binding costs and timescales. Anything less is a recipe for disaster, and unfortunately the Infrastructure Schedule at Appendix C of the Plan falls well short of this requirement. I therefore OBJECT to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy I2: Supporting The Department for Transport’s “Road Investment Strategy”

This policy again sounds hopeful on a first reading, however the same point applies as was identified for Policy I1. Paragraph 4.6.14 identifies three RIS Schemes that are relevant to Guildford:

- M25 upgrade J10 and J16 (“anticipated to commence” 2015 – 2020)
- M25/A3 interchange improvement (“anticipated to commence” 2020 – 2025)
- A3 improvements from the A320 to the A31 (no timescale given)

Similarly, paragraph 4.6.15 states that “The Council has and will continue to work closely with Highways England to tailor its development management processes, including for allocated strategic sites, with Highways England’s emerging schemes and their proposed timing and phasing. This will ensure that the assumptions used in developer’s transport assessments are robust. The timing and phasing of the delivery of Highways England’s emerging schemes will be key to addressing the existing peak hour congestion that often occurs on the Strategic Highway Network.”

Clearly the Council cannot be criticised for projects that are outside its control. However, it is not sensible or acceptable to propose a Local Plan that includes major developments in the borough that depend on key infrastructure delivered by an external supplier (Highways England) whose timescales are so questionable. I therefore OBJECT to this policy and to all policies that depend on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable Transport for New Developments

Like the policies above this policy has initial appeal that does not bear detailed examination; it reads very much as though it has been copied from a manual of some sort.

As commented at the start of this response letter, there is little point in “expecting” various deliverables from new developments; this Policy has to “require” them or they simply won’t be delivered. This policy needs to be redrafted.

I also see that paragraph 4.6.22 still contains the statement from the previous draft that “For the average person cycling has the potential to substitute for short car trips, particularly under five kilometres, and walking for trips under one kilometre”. While it’s correct that the potential exists, the chance of it happening (without a massive campaign, coupled with a major increase in fuel prices) is very small. Just as an exercise, it would be very interesting to carry out a survey of Council staff to find out how far from work they live, and how many ever cycle to work. Of those that do, a supplementary question should be on how many days in the year they do so. One only has to drive in Guildford in the rush hour to know that it’s a small proportion of the total.

To be fair, making changes to established travel habits will be difficult, and the planning system is just one part of the overall whole. But nevertheless, bearing in mind the requirements of NPPF paragraph[.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10661  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I4: Green and Blue Infrastructure

It is surprising to find this policy in the same document that proposes a very substantial increase in the number of houses, the removal of Green Belt protection from fifteen villages in the borough, the construction of two thirds of the proposed housing on land that is currently in the Green Belt, and a 2,000 unit housing development built right up to the boundaries of the AONB. With this level of development, it is difficult to countenance the suggestion that this policy will have any credible effect on green and blue infrastructure. Therefore OBJECT to the clear inconsistency of the Local Plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy on the following grounds:

NPPF paragraph 154 states that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” Policy P1 as currently drafted is far too loose to provide a decision maker with effective guidance on how to react to a planning application, and it must be amended to make it far more prescriptive. Moreover, in important respects it is considerably weaker than the equivalent policy in the 2003 Local Plan; specifically there is no guidance as regards the relative weight that should be attached to the provisions of the current Surrey Hills AONB Management Plan as opposed to the bulleted points in the policy.

In addition, it is insufficient to state simply that “The AGLV will be retained until such time as there has been a review of the AONB boundary. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV itself”. For the sake of argument, what would happen to areas of AGLV, if the AONB review was undertaken and led to no change at all to the present boundary? All that is said at present is that “the landscape character of the countryside remaining outside the AONB boundary will be protected and enhanced through criteria based policies, and if appropriate, local designations included within the Development Management Policies DPD”. This Local Plan is supposed to set out the policies that will prevail throughout the Plan period; it is not acceptable to simply defer consideration of this issue until some unspecified time in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/10635  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

I OBJECT that as GBC has made no attempt to verify the accuracy of the OAN published in the West Surrey SHMA Final Report (September 2015), and that two independent reports have identified errors in the derivation of the OAN (see the comments on Policy S2 above), the statement in paragraph 4.3.16 of the draft Local Plan that “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development” is completely untenable.
I OBJECT that the proposal to inset villages from the Green Belt is based on the Green Belt and Countryside Study, which has been widely criticised and discredited for (amongst others) the following reasons:

- Being internally inconsistent.
- Being highly subjective.
- Being rehashed at least twice with the apparent aim of supporting a pre-judged conclusion. This pre-judgement largely aligns with the results of the Settlement Hierarchy was itself comprehensively discredited in 2013-14.
- It’s adherence to a methodology that supposes that sensitive decisions on complex matters can be taken by a very simplistic scoring system based on a trivial tick box approach.

I OBJECT to the specific conclusions to inset both East and West Horsley. In particular, the entire length of The Street in West Horsley is a fairly typical rural Surrey Hills village with a considerable proportion of Listed Buildings, and it makes an important contribution to the openness of the Green Belt; there is therefore absolutely no reason for it to be inset in a misguided attempt follow the provisions of NPPF paragraph 86. I strongly suspect that the same can be said of several of the other dozen or so villages that the Plan proposes to inset, and these also need to be reviewed.

Notwithstanding my objection to insetting the villages, I object to the way in which the proposed insetting boundaries have been drawn. NPPF paragraph 85 requires new Green Belt boundaries to be clearly defined using “physical features that are readily recognisable and likely to be permanent”. In this regard, the following cases do not comply with the provisions of NPPF:

- In West Horsley, the Green Belt and Countryside Study (GBCS) defines boundaries 3B, 3C, 3D, 3E, 3F and 3M which are all simply plot boundaries at the end of residential gardens. Elsewhere in Section 26.3 of Volume 6 of the GBCS, it states that “More temporary features, such as fencing, are not considered to provide the degree of permanence necessary to represent a Green Belt boundary in accordance with the NPPF”.
- Also in West Horsley, the boundary drawn around Allocated Site A41 is an example of the substitution of a good defensible boundary along East Lane by a very subjective and rather contorted boundary around three fields, where the proposed boundary is marked by hedgerows and plot boundaries – which are clearly not so defensible as the more obvious boundary along East Lane.
- In East Horsley existing boundaries along watercourses on the eastern side of fields of Allocated Site A39 and the recreation area in Kingston Meadows have been moved to less identifiable and less defensible boundaries along the western side of the corresponding areas. These boundaries are less defensible than the line of the watercourses that they have replaced.

I am confident that the examples above are precisely that – examples which no doubt repeat themselves time after time across the borough. The entire basis of the proposal to inset the villages needs to be reviewed, because it pays little more than lip service to the requirements of NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P4: Flood Risk and Water Source Protection Zones

Policy P3 states that “Development in areas at risk of flooding … will be permitted provided that … the proposal passes the sequential and exception test (where required) as outlined in the NPPF and Government guidance”.

Paragraph 4.3.40 of the draft Local Plan states that “In accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.”

This appears to show a clear intention to act in a way that is at odds with the precautionary principle. The approach documented in NPPF paragraph 100 states that “Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change …”. The position seems to be clear; the draft Local Plan seems to have been drawn up on the basis that it is more important to deliver the full OAN (despite the problems in the calculation of the housing number that have already been described) than it is to ensure that flood risk is minimised. This ducks the whole question of responsible plan-making, and the implicit obligations of the plan makers to the eventual occupants of new dwellings.

I therefore OBJECT to this policy, and strongly urge that it should be redrafted on a suitably precautionary basis to absolutely minimise flooding risk; if that approach puts a constraint on the number of houses that can be provided for in the Local Plan, so be it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10638  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5: Thames Basin Heaths Special Protection Areas

I have sympathy with the sentiment of this policy, but I OBJECT to its practical effect.

In the case of the recent Wisley Airfield Planning Application, the applicant proposed to use a SANG that lay between the development site and the SPA, which would therefore have drawn walkers and dogs towards the environmentally sensitive area of the SPA, thereby frustrating the whole purpose of providing the SANG. I am aware that Natural England is a statutory consultee, but this policy must be drafted so that the Council, and the Planning Committee in particular, is not left having to accept advice that is clearly wrong-headed. This Policy is our policy for the protection of our environment, and it should make it quite clear that the Council and residents wish to apply conditions that prevent the negation of safeguards that have been developed specifically for the purpose of environmental protection. I therefore propose that the TBHSPA Avoidance Strategy is reviewed, its provisions updated and strengthened, and that it is specifically called up in this policy so that the appropriate protection can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.1 Policy S1: Presumption in Favour of Sustainable Development

I OBJECT that the current draft is highly selective in its adoption of the principles of NPPF, in particular the following:

- The NPPF Ministerial foreword states that “‘Sustainable’ means ensuring that better lives for ourselves don’t mean worse lives for future generations.”
- The foreword also states: “Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. This should be a collective enterprise. … In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities. This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning.
- Paragraph 155 states “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The current Plan has been constructed with remarkably little involvement of residents; certainly there has been no sign of “early and meaningful engagement and collaboration”; on the contrary, the experience of residents has been that the evidence base documents and plans have been developed in isolation behind closed doors, and then pitched into the public domain in the form of multiple large impenetrable documents. To add insult to injury, the Council has then fought a consistent rearguard campaign to defend many of the evidence documents against serious and well-argued criticism from residents.

I OBJECT that NPPF paragraphs 87 and 88 seem to have been discounted. They state that “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”, and that “Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.

Ministerial guidance published by Brandon Lewis MP and Nick Boles MP on 17th January 2014 and 18th June 2014 makes it clear that unmet housing need alone is unlikely to qualify as “exceptional circumstances” and, further, that Greenbelt and AONB can be reasons for not meeting objectively assessed housing need. I OBJECT that this guidance seems to have been ignored.

I OBJECT that the scale of development that is proposed is anything but sustainable – it involves disproportionate development of villages (35% in the case of West Horsley); the extraction of large swathes of land from the Green Belt (about 7% of Guildford’s Green Belt being removed at a stroke); with two thirds of the proposed housing destined to be on
land that is currently in the Green Belt. Proceeding at that rate would rapidly destroy all of the non-AONB Green Belt in the borough, and with it the important protections to the countryside along the A3/A31 corridor. The five purpose of the Green Belt as defined in NPPF are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

All these would be under threat if the current Plan goes ahead.

I OBJECT that the following extract from NPPF paragraph 14 has been ignored (my underlining):

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. ... For decision-taking this means (unless material considerations indicate otherwise):

- …
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless ... specific policies in this Framework indicate development should be restricted. (For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.)"

This paragraph gives an explicit statement that the default position is to grant permission but not for Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10631  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy

The Strategic Housing Market Assessment (SHMA) derived annual objectively assesses housing need (OAN) of 693, and the Local Plan calls for 13,860 homes to be built, which is the OAN multiplied by the 20-year term of the Plan (20 x 693 = 13,860). I OBJECT to this level of planned housing on the following grounds:

- The Council has taken no steps to verify that the OAN is a valid estimate.
- Two recent reports (one by myself) have identified that derivation of the OAN in the SHMA was based on mutually inconsistent sources of data for the housing need arising from economic growth. Both reports also raised queries on the assumption that the ONS SNPP data for 2012 should be regarded as having a zero value for Unattributable Population Change.
The assessed annual OAN has been superseded by the result of the EU referendum.

The calculation of windfalls does not take proper account of the likely increase in ad hoc infill developments given the large scale insetting of villages from the Green Belt.

The OAN has been carried forward directly into the Plan as the housing target, without applying the very real constraint of the Green Belt (which covers some 89% of the borough).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1344  Respondent: 9335041 / David Reeve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Poor Drafting

I OBJECT that the provisions and policies of this Plan are likely to be challenged by developers, and it therefore needs to be much clearer and more prescriptive.

Specifically, replace “expect” by “require” in the following paragraphs:

Policy H1: We expect 60 per cent …

4.2.4: … we will expect new homes …

4.2.20: … we will expect all new …

Policy H2: Developers will be expected to provide land …

4.2.39: We will expect developments …

4.2.39: … developers will be expected …

4.2.39: … they will be expected to meet the costs …

Policy P1:

4.3.5: … proposals within and adjacent to the AONB will be expected to conserve …

Policy P2:

4.3.23: Replacement buildings are expected to be sited …

Policy P5:

4.3.60: SANGs must be approved by Natural England and will be expected …

Policy E4: It is expected that the new extension will provide …
Policy D1: … be expected to have regard to …
… be expected to use art and materials …

4.5.8: We will expect development to respond …

Policy I3: We will expect that new developments will …

We will expect new development to:
We will expect new developments to demonstrate …
We will expect all applications for development that generate …

Policy I4:

5.6.45: The Council expects the delivery of new SANGs …

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp173/664  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

**A25, A26 & A35 (Gosden Hill Farm, Blackwell Farm & the Former Wisley Airfield)**

**OBJECT to A25, A26 & A35 (on 5 distinct grounds below, plus several more identified in outline)**

I object to the inclusion of these sites for the following reasons, which together lead to the OAN being overstated by somewhere in the range of about 1,500 to 3,000 dwellings. Given that these three strategic sites would provide a total of some 5,200 dwellings, it is not at present possible to make a rational decision which sites to include because of the large error in the OAN.

1. The change in the planned number of homes from 13,860 (based on the West Surrey SHMA Final Report, September 2015) to 12,426 (based on the West Surrey SHMA Guildford Addendum Report, March 2017) is not supported by credible, well-qualified alternative assessments. In particular the reports produced by Neil McDonald Strategic Solutions in both 2016 and 2017 demonstrate that the SHMA assessments of the objectively assessed housing need (OAN) have been considerably over-stated, mainly because of:

a) The particular circumstances of Guildford being a modest-sized town hosting a large university and other further education colleges with a correspondingly large population of students, and

b) Errors in the assessment of the housing need arising from economic growth.
Planning Practice Guidance paragraph: 005 Reference ID: 2a-005-20140306 makes it clear that where appropriate Local Planning Authorities may depart from the standard methodology for deriving the OAN, and Guildford’s circumstances certainly justify that approach. I **therefore object to these Allocations on the grounds that the OAN assessment is faulty.**

1. Moreover, paragraph: 004 Reference ID: 2a-004-20140306 of the Guidance states that “The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.” Policy S2 is a specific policy of the Local Plan in which constraints have not been applied, and I **therefore object to these Allocations on the grounds that no constraints have been applied.**

2. Finally, I attach a copy of ministerial advice in two separate letters from Nick Boles MP, Parliamentary Under Secretary of State (Planning), which made it clear that “Student housing makes a significant contribution towards housing supply by taking pressure off demands on housing stock. This Government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs regardless of whether they communal or sited on a university campus.” I have found nothing in the SHMA or the draft Local Plan that indicates that the proposed housing number was calculated after taking full account of the proposed scale of new student accommodation. **Therefore I object to these Allocations on the grounds that the final housing number has been calculated incorrectly.**

3. In addition to the comments above that are based on fundamental problems in the assessment of the OAN (ie. unreliable calculations and the failure to account properly for student accommodation) and the failure to apply constraints, I **have a further specific objection to A25 (Gosden Hill Farm)** as a result of considering it in conjunction with Policies A43 (Garlick’s Arch) and A58 (land around Burnt Common Warehouse). Together these three Allocated Sites form two miles of almost continuous dense development alongside the A3 trunk road, with a short break of just 700 yards separating A25 from A58. Moreover, A25 is itself adjacent to Burpham which is already part of the existing Guildford conurbation. NPPF paragraph 79 states that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”, and paragraph 80 states that the first of the five defined purposes of the Green Belt is “to check the unrestricted sprawl of large built-up areas”. Sprawl is exactly what these three Policies, taken together achieve.

The joint impacts of these three Policies are fundamentally at odds with the provisions of NPPF, and with the many ministerial statements concerning the importance of the Green Belt – in particular its openness and its permanence. I **therefore strongly object to Policy A25.**

1. Furthermore, in addition to the comments above that are based on fundamental problems in the assessment of the OAN (ie. unreliable calculations and the failure to account properly for student accommodation) and the failure to apply constraints, I **have a further specific objection to A35 (former Wisley Airfield).** The new text in paragraph 4.6.20 states that “The NPPF requires that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also states that different policies and measures will be required in different communities and that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. Our spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable. Achieving sustainable transport has been a key consideration in setting the spatial development strategy.”

Given that as an approach, it is difficult to see how A35 ever managed to survive in this draft of the Local Plan, as the reality is that travel from that proposed settlement would be highly unsustainable – the overwhelming majority of journeys would inevitably be by car. I **therefore strongly object to Policy A35.**

1. Quite apart from the above five fundamental objection, there are dozens of further objections when the detailed circumstances of each site are considered, eg. effects on traffic; sustainability; infrastructure; impact on the AONB; air and noise pollution; nitrogen deposition. I **wish to register each of these as additional objections.**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4295  
Respondent: 9335041 / David Reeve  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of this Allocation from the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4296  
Respondent: 9335041 / David Reeve  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of this Allocation from the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4297  
Respondent: 9335041 / David Reeve  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have considered this Policy alongside Policies A25 (Gosden Hill Farm) and A58 (land around Burnt Common Warehouse). Together these three Allocated Sites form two miles of almost continuous dense development alongside the A3 trunk road, with a short break of just 700 yards separating A25 from A58. Moreover, A25 is itself adjacent to Burpham which is already part of the existing Guildford conurbation. NPPF paragraph 79 states that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”, and paragraph 80 states that the first of the five defined purposes of the Green Belt is “to check the unrestricted sprawl of large built-up areas”. Sprawl is exactly what these three Policies, taken together achieve.

The joint impacts of these three Policies are fundamentally at odds with the provisions of NPPF, and with the many ministerial statements concerning the importance of the Green Belt – in particular its openness and its permanence. I strongly object to this Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of this Allocation from the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 2 distinct grounds)

1. I have considered this Policy alongside Policies A25 (Gosden Hill Farm) and A43 (Garlick’s Arch). Together these three Allocated Sites form two miles of almost continuous dense development alongside the A3 trunk road, with a short break of just 700 yards separating A25 from A58. Moreover, A25 is itself adjacent to Burpham which is already part of the existing Guildford conurbation. NPPF paragraph 79 states that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl
by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”, and paragraph 80 states that the first of the five defined purposes of the Green Belt is “to check the unrestricted sprawl of large built-up areas”. Sprawl is exactly what these three Policies, taken together achieve. The joint impacts of these three Policies are fundamentally at odds with the provisions of NPPF, and with the many ministerial statements concerning the importance of the Green Belt – in particular its openness and its permanence. I strongly object to this Policy.

1. The proposals for Site A43 (Garlick’s Arch) and the virtually adjacent Site A58 (Burnt Common) have changed between the 2016 draft Local Plan and the present draft. In 2016 a maximum of 7,000 m2 of mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) space was proposed at Garlick’s Arch, whereas a minimum of 7,000 m2 of space for the same purposes is now proposed at Burnt Common, but no evidence is presented to support this change. Indeed the table in paragraph 1 of Policy E2 states that the land area assessed as being required for the same classes of employment over the same period has changed from a range of 4.7–5.3 hectares to 3.7–4.1 hectares. As the assessed requirement has reduced, the proposed increase in floorspace allocation in the present draft seems to be purely opportunistic. I therefore object to this Policy.

This Policy is physically misplaced in the draft Local Plan – it appears between Policies A47 and A48, and should be moved to be in its correct position after Policy A57.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4294  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Partly SUPPORT / partly OBJECT (on 3 distinct grounds)

- I support the larger number of residential dwellings to be constructed on this site.

- I acknowledge the reduction in planned retail space, but I nevertheless object because I do not believe that the proposed reduction is sufficient, owing to the large structural changes in the retail market arising from internet shopping and home deliveries.

- The Plan is extremely equivocal on the detail of what is intended for the bus station. A Plan is not a plan if it does not clearly articulate what the future is going to be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2638  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Partly SUPPORT / partly OBJECT (on 3 distinct grounds)

1. The almost certain uptake of electric vehicles will require charging points in the vast majority of dwellings within the timescale of the Local Plan. Therefore this Policy should make provision for electric charging points to be installed in all new dwellings and in conversions of existing buildings to domestic residences.
2. Paragraph 4.5.18b is poorly worded. How is it proposed (within the planning system) to offset the carbon that will be emitted during the occupied life of a building?
3. In paragraph 4.5.30, why is Guildford town centre exempted from the requirement for new buildings to “achieve a reasonable reduction in carbon emissions of at least 20 percent …”? Similarly, the second half of paragraph 4.5.37a, indicates that retail developments in the town centre will be exempted from the general requirements for low carbon development. Climate change is a serious global problem, and will not be solved unless meaningful targets are pursued on all fronts. This Policy needs to ensure that residential and businesses premises both meet the environmental standards for the benefit of everybody. Overall these paragraphs need to be significantly tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2639  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Partly SUPPORT / partly OBJECT

Paragraph 4.5.49b sets out a position on public art. At a time when the UK has a large shortfall of housing supply against growing demand, I strongly object to funds being channelled into public art instead on helping to solve the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2635  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 states that "District Centres sit in the middle of the retail hierarchy, and the whole of that Policy refers to retail uses. Paragraph 4.4.91 states that "Most ground floor uses in District Centres are within the ‘A Use Class’, that is, they are shopping area uses. Other uses typically found in shopping/service centres are outside of the ‘A Use Class’, and include health and fitness centres, arts and culture, nail bars, and hotels”.

However, Policy E2 seems to aim to extend the purpose of District Centres so that the draft Local Plan considers them for locations of new employment floorspace, in addition to their main purpose as retail centres – which is at odds with the entire description of Policy E8.

Furthermore, it is extremely odd that Horsley Station is described as a “transport interchange”. The only interchanging that would be possible would be between train and bus services. There is a good train service between London and Guildford, but the bus services at Horsley station are extremely limited:

- four buses run daily (Mon-Fri only) between Guildford and Leatherhead (478 Service).
- five buses run daily (Mon-Fri only) between Leatherhead and Guildford (478 Service).
- The Howard of Effingham school bus service runs once a day in each direction (678 Service).

As In previous drafts of the Local Plan, there is a substantial overemphasis of the facilities in East and West Horsley, which seems to be an attempt to justify the excessive level of development that is proposed.

The “Transport Interchanges (Horsley)” map in Appendix A1 shows that the circle of 500m radius centred on Horsley station encloses only the following (ranked in terms of reducing area):

- Residential homes
- Green space
- Station Parade retail area
- The Village Hall
- The Medical Centre
- Glenesk School
- Two small offices, one housed in the station building, and the other converted from its previous use as a medical centre.

There is no purpose-built office employment space at present, and I am not aware of any need for it in this area.

The rather fanciful categorisation of Horsley station as a “transport interchange” just because it is “in close proximity to [a] district centre”, and the resulting dubious suggestion that the neighbourhood should be considered as suitable for new employment floorspace need to be re-examined. I therefore object to this Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2636   Respondent: 9335041 / David Reeve   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 3 of the Policy makes provision for Station Parade in East Horsley to accommodate “main town centre uses”, which are defined as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Frankly, one wonders whether the authors of this Policy have ever bothered to visit East Horsley to see what completely inappropriate nonsense this is. Some of these uses might conceivably be appropriate, but I don’t even think GBC really intended to open the door to the inappropriate ones. There are only three District Centres, so it would have been quite possible to define the specific uses that were really being considered for each District Centre, and to agree them individually with the relevant Parish Council and with residents. As it is currently drafted, it is likely to lead to many unnecessary consultation responses. Moreover the current text fails to comply with NPPF paragraph 154 which states “Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.”

I strongly object to this Policy on the grounds that a little sensible reconsideration could produce a draft that would be considerably more acceptable to local residents without significantly changing the planning outcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2637  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 2 distinct grounds)

1. For this Policy, which includes Bishopsmead Parade in East Horsley, the same objection applies as that stated for Policy E8. At least paragraph 5 of this Policy states that the main town centre uses must be “consistent with the scale and function of [the] centre”. Even so, it would be far better to review the list of main town centre uses, and then explicitly identify the acceptable subset of those uses – though in Bishopsmead Parade I suspect that the subset might be quite small.

2. Paragraph 4.4.96 suggests that a “reasonably flexible approach to ground floor main town centre uses” would be appropriate. However, that is not sufficiently specific in planning terms and again fails to comply with NPPF paragraph 154.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**OBJECT (on 3 distinct grounds)**

1. The paragraph on Density should be retained.
2. Paragraph 5 on student accommodation is far too weak. Specifically:
   a) The phrase “… will be encouraged on campus locations where appropriate” should be replaced by “… will be required on campus locations”.
   b) The word “about” in line 2 of should be removed. Retaining it would simply guarantee a never-ending series of arguments with the University of Surrey.
   c) The proportion of students for whom campus-based accommodation should be provided should be significantly greater than 60%, and this figure should be a requirement, rather than simply an “expectation”.
   
   1. In line 8 of paragraph 4.2.18 of the explanatory text associated with this policy the proposed replacement of “required” by “expected” is unacceptable.

In addition (but not specifically a point of objection) the word “all” in paragraph 2, line 1 is confusing. The line should read either “… net loss of all types of housing …” or “… net loss of housing …”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECT – regrettably – (on 3 distinct grounds)

I support the aspiration of promoting homes that are affordable for those in housing need – but this policy will not help many of the borough’s residents who are in most need of assistance. Land and housing prices in this part of Surrey, even when discounted to 80% of their market values, will remain well out of reach of many residents. An initiative is required to build social housing on Council-owned land in order to enable larger numbers of lower-paid and younger residents to rent their home at a price they can afford without requiring the support of housing benefit (which currently costs the UK almost £28 billion per year). On the contrary, this policy – while consistent with national policy – will simply exacerbate the house price problem, because developers will recoup the 20% discount on the 40% of the “affordable” units by simply increasing the price of the remaining market units. Built-in house price inflation!

In paragraph 2 of the Policy, the word “seek” should be replaced by “require” in both places where it appears.

Similarly in paragraph 4.2.39, the word “expected” should be replaced by “required” wherever it appears.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2640   Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 2 distinct grounds)

1. Paragraph 5 of this Policy states that “When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation”. There are two fundamental points here:

a) “Key infrastructure” is exactly that – it is “key” ie. essential. Residents don’t want planners to “have regard for” the delivery and timing of such infrastructure; instead they want a genuine guarantee that infrastructure will be in place when it is required, and not a day later.

b) Because “key infrastructure” is essential (by definition), its absence cannot be “mitigated by alternative interventions”.

This paragraph seriously weakens the provisions of paragraph 2 of the Policy, and it needs to be deleted. Any form of words that hints that there could be an acceptable formula for delaying the delivery of infrastructure will simply be an open invitation for developers to pursue exactly that goal. I object to this Policy on the grounds that it is simply aspirational and is too weak to withstand challenge at Planning Appeals.

1. As a separate point, Appendix C to the draft Local Plan lists a series of infrastructure projects with a total cost of well in excess of £1 billion, whose joint effects would have a very significant impact on a large proportion of the borough’s residents. In addition, there will inevitably be very considerable interactions between the various individual projects, and with most if not all of the major development projects that are proposed. These interactions will arise both from the “static” physical influences of one upon another, and in the relative timings of the various projects. Moreover, the timescale (and even potentially the very existence) of many of the more
significant projects is outside the control of Guildford Borough Council. Overall, this collection of infrastructure projects needs to be planned and phased very carefully indeed. In short, there needs to be an infrastructure masterplan which is formally agreed between the various contributors. Otherwise instead of being a well-constructed programme of inter-related improvements, the required infrastructure developments will depend more on an “it’ll be alright on the night” approach – which would lead to painful long term chaos for residents. The Plan presents no evidence from which to draw confidence that an adequate level of planning has taken place; even the introductory remarks in Appendix C state that it “is not an exhaustive list of all the infrastructure that will be provided or improved in the borough during the plan period”. Moreover, I have not even been able to find a simple map that presents in one place a basic layout of the various projects from which one could readily infer at least some of the likely interactions between them. I object to this Policy on the grounds that a great deal of work remains to be done before borough residents can even consider the overall proposals before them in a rational way. A properly considered, detailed infrastructure masterplan (including phasings, formal commitments by the contributors, and a proper examination of the impacts of any changes in the relative schedules) will be essential before even considering embarking on an “adventure” such as this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2641  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 3 distinct grounds)

1. Paragraph 11 is understandable – but it needs to be amplified by further conditions. At present it effectively states that the Planners would have no option but to support an application for off-street parking that reduced traffic through the gyratory … even if the design was the most hideous concept that had ever been created. I’m sure that is not the intention, but this wording is a serious hostage to fortune.

2. The drafting of this Policy is inadequate: a) I have no idea what the practical meaning of paragraph 6 of this Policy means. Will it be a planning condition? Will the Council pay for it? At present it really doesn’t say anything. b) I also fail to understand what paragraph 7 of the Policy really means. If it is not readily understandable, it fails the test of NPPF paragraph 154.

3. In the interests of making best use of land, all new parking in the town should be required to be multi-storey, and should preferably include at least some floors below ground level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2631  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 3 distinct grounds)

1. I object to the proposed removal of the five bulleted items under paragraph 1 of the Policy.
2. I object to the proposed removal of the final sentence paragraph 4 of the Policy, i.e. “Exceptions may only be made for proposals that meet both criteria specified in paragraph 116 of the NPPF”.
3. I object to the deletions in paragraph 4.3.6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2632  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the arbitrary and inconsistent approach used in the Green Belt & Countryside Study, and also to the pre-ordained results of the Settlement Hierarchy. I note that no revision has been made to the Settlement Hierarchy despite my earlier correspondence which presents conclusive evidence that the hierarchy was “adjusted” on a highly subjective and pre-judged basis (see attached letter dated 19th June 2014). The large volume of carefully considered objections to the Green Belt & Countryside Study in previous consultations and in separate correspondence has also apparently been ignored by the Council. As the underlying rationale for insetting is flawed, and is therefore unreliable, this Policy itself is unreliable and its provisions to inset villages should be struck out.

I therefore object to this Policy on the grounds of a wholly inadequate evidence base for the selection of villages for insetting, and on the arbitrary and inappropriate choice of insetting boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2633  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The new final sentence in paragraph 4.3.39 is too weak. Replace “should” by “must”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2634  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT (on 2 distinct grounds)

1. The proposed amendments to sentence 2, paragraph 1 of the Policy (“Where one or more adverse effects on the integrity of the SPA are likely will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity.”) introduces a degree of certainty into the required test that cannot realistically be achieved. This will mean that it will be much easier for developers to evade their intended responsibilities to avoid and/or mitigate any effects of their proposed development(s) on the SPA. I therefore object to this proposed change.

2. The final sentence of the new text in paragraph 4.3.50c is unacceptable. A proposed development that provides or contributes to SANG/SAMM should not be exempt from the requirement to undergo Appropriate Assessment. By way of illustration, I understand that the applicant for the Wisley site originally proposed to use part of the site that fell within the “exclusion zone” as SANG. In order to protect the SPA from any chance of such approaches in the future it is essential that exemptions from Appropriate Assessment are not possible. I therefore object to this sentence of the proposed change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2628  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT (on 4 distinct grounds)

1. Paragraph 1 of the Policy states that the Local Plan will make provision for 12,426 homes over the period from 2015 to 2034. However the table of annual housing targets over the period 2019 to 2034 totals 9,810 homes, which is 2,616 fewer than the figure in paragraph 1. This difference implies that an average of 654 homes (2,616 / 4) were built in each year of the four years between 2015 to 2019 – which is almost certainly incorrect, as Guildford has never delivered completed homes at anything approaching this rate. I therefore object to this Policy on the grounds that the numbers don’t add up.

2. Additionally, and quite separately, the change in the planned number of homes from 13,860 (based on the West Surrey SHMA Final Report, September 2015) to 12,426 (based on the West Surrey SHMA Guildford Addendum Report, March 2017) is not supported by other credible and well-qualified assessments. In particular the reports produced by Neil McDonald Strategic Solutions (NMSS) in both 2016 and 2017 demonstrate that the SHMA assessments of the objectively assessed housing need (OAN) have been considerably over-stated, mainly because of:

   a) The particular circumstances of Guildford being a modest-sized town hosting a large university and other further education colleges with a correspondingly large population of students, and

   b) Errors in the assessment of the housing need arising from economic growth.

Planning Practice Guidance paragraph: 005 Reference ID: 2a-005-20140306 makes it clear that where appropriate Local Planning Authorities may depart from the standard methodology for deriving the OAN, and Guildford’s circumstances certainly justify that approach.

I therefore object to this Policy on the grounds that the OAN assessment is faulty.

1. Moreover, paragraph: 004 Reference ID: 2a-004-20140306 of the Guidance states that “The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.” Policy S2 is a specific policy of the Local Plan in which constraints have not been applied, and I therefore object to this Policy on those grounds.

2. Finally, I attach a copy of ministerial advice in three separate letters from Nick Boles MP, Parliamentary Under Secretary of State (Planning), which made it clear that “Student housing makes a significant contribution towards housing supply by taking pressure off demands on housing stock. This Government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs regardless of whether they communal or sited on a university campus.” I have found nothing in the SHMA or the draft Local Plan that indicates that the proposed housing number was calculated after taking full account of the proposed scale of new student accommodation. Therefore I object to this Policy on the grounds that the final housing number has been calculated incorrectly.

ATTACHMENTS


1. D Reeve Letter 3 - Settlement Hierarchy (May 2014).docx

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
To Whom It May Concern

I would like to OBJECT to the proposed development of over 1000 houses, a secondary school, retirement home, railway parking and industrial units on Site A46 in Normandy.

The following are my reasons:-

1. This is Green Belt Land and this development would ruin rural aspect of Normandy, effectively creating a New Town and this would no doubt lead to contiguous development between Guildford and Ash. I do not see how you can justify 'exceptional circumstances' to release this land from its Green Belt status, especially given the sensitivity of the area for wildlife, being part of the Thames Basin SPA and especially the break it provides between the urban areas of Guildford and Ash/Aldershot.

2. I understand from a local meeting, that if the need for a secondary school cannot be justified then this development will no longer go ahead. I also understand that at present there is a considerable amount of empty spaces in Kings School in Guildford and that both this school and Ash Manor are willing to expand to meet the expected bulge in demand for secondary places in about 4 years time. I use the word 'bulge' as the increase will only be short term - about 5-8 years at the most. You yourselves know that in the last 10 years at least 3 schools have been closed within Guildford Borough due to a drop in demand. It would certainly be a waste of money to build a whole new secondary school 5 - 8 miles from where the majority of students will be coming from that may well end up being a white elephant almost as soon as it is completed, if not before. I would also like to know how these students are expected to travel to this school? I presume most would come by car adding more to the congestion on the roads. Even if you built 1,000 extra houses these would not provide approximate 1,000 - 1,500 children to fill the secondary school on a permanent basis. Can I respectfully suggest that you utilise the schools you already have in the west side of Guildford and improve access to those schools for students from around the Borough.

3. Traffic and roads: Already the roads in this area are incredibly busy for a small village and I do not believe you have any realistic budget to actually improve them in any way. Westwood Lane and Glaziers Lane are small country roads and both have significant hazards at the railway bridges. Increasing the traffic volume in these areas will result in an increase in accidents, potentially fatal. These roads are already busy for their size during the rush-hour period and the foot paths are very hazardous for pedestrians as they are narrow in places and are often used by parked cars. Essentially, these lanes are already at capacity, especially if there is the slightest incident on the Hogs Back! The Guildford-Aldershot road is also a very busy road and is frequently close to standstill during rush hour. Crossing this road is already hazardous for pedestrians and cyclists are given very little space. Adding another 2,000 odd vehicles to these small roads on a daily basis + the school traffic would turn Normandy in to a large car park for huge chunks of the day. I know there is a railway station and that you are looking to improve the parking at the station and add another station on the way towards Guildford. These
are good aims, but unless the number of trains is increased and the ability to take bicycles on all trains, especially rush hour trains is allowed, then the train does not improve the transport issue at all. On the topic of bicycles, a proper cycle route is required between Ash and Guildford so that road bikes, mountain bikes and even children can cycle easily between the different parts of the village and the nearest towns.

4. Natural Environment: As you know Normandy is within 5Km of the Thames Basin SPA and as such development of this scale is not permitted. There is a wealth of wildlife in and around Normandy that would be greatly affected by the increase in people, traffic, pets, noise, light and so on. Within the proposed site are some lovely areas of Ancient Semi-Natural woodland – one of the UK’s rarest habitats.

5. Flooding: Much of the land you are interested in developing on already has water-logging issues due to the nature of the soils and rock beneath. There are many properties in the village that already suffer from flooding and due to the impact of Climate Change, this is only going to increase. Building further housing and increasing the hard surfaces to increase the rate of run-off to the small streams that drain the area will increase the likelihood and severity of flooding both for the new homes and the existing homes. Even with the construction of wetland to cope with increased run-off, I do not believe that you will stop the exacerbation of this problem.

I would also like to ask why you are going for such large developments in a few areas which will greatly impact on the character and infrastructure of these areas – mostly things that you cannot (will not?) do much about?

Would it not make more sense to spread the load across the Borough? Perhaps each village/town to get a proportion of the required houses depending on existing size. So Guildford would take the bulk (as it should) and other towns would get a larger proportion than the rural villages in Green Belt or AONB areas. Then within the smaller villages especially, when a large house with land is put on the market the owner has the option of putting this house for village development at the market price. The council could then ensure that each village meets its requirements over the period of the plan by infilling and replacement of large homes with smaller, more practical and affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would also like to make the point that by creating a housing development on the site of Blackwell Farm (which was vacated by the UniS Vice-Chancellor on the grounds of the subsidence problems of the area, the ground being a mixture of clay and the edge of the chalk ridge) which is currently in the Green Belt, there must be ‘exceptional circumstances’ to use this site in preference to other non-Green Belt sites.

Only this week, I read that the Rokers site, at Fairlands Farm, Holly Lane, was rejected by councillors on the groups that it was an “inappropriate development” within the green belt and because the development failed to mitigate its impact on infrastructure. According to the report, planning officers also warned of the potential adverse impact on the habita, flora and fauna withing the Broad Street and Backside Common Site of Nature Conservation Interest (SNCI) – both of which equally form a very important and ancient wildlife corridor with the Blackwell Farm site under consideration. It was also stated that councillors consider it important to look whether ‘inappropriate development’ of a green belt site can be justified by exceptional circumstances. It was seen that this was not the case – yet the development of the Blackwell Farm site is massively greater and will impact not only the immediate community, the character of the landscape, the protected species – yellowhammer, skylark among others – but will furthermore have the following detrimental outcomes:

- It will direct more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas. This will directly negatively affect the emergency service response from the hospital
- It ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- It will add to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3459  Respondent: 9408833 / Carol Herzig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/4915  Respondent: 9408833 / Carol Herzig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/840  Respondent: 9409633 / Christopher Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission Local Plan: Strategies and Sites June-July 2016 Consultation

My address is above. I have lived in West Horsley for over 40 years.

I cannot stand by and watch the construction of 385 homes in West Horsley without protesting in the strongest possible terms. The Key Evidence Document ‘Guildford Borough Economic Strategy 2013-2031’ does not make a case for placing a large number of extra homes in West Horsley or elsewhere. For the purpose of this letter I am only concerned with the Horsleys.

Furthermore the above strategic planning document makes no case for an extra 100 homes in East Horsley. And why the Horsleys, given that new economic development sites are a long way from here on the other side of the Borough?

The 385 extra homes will further compound the ‘planning’ errors committed while I have lived in West Horsley. The last 40 years have seen significant infilling which has left West Horsley like a large housing estate with only 2 significant non-farming businesses, and a couple of pubs. During this time, apart from a little tinkering, there have been no significant
infrastructure changes, and none are proposed now. The needs of the occupants of the proposed homes will put an
unsupportable burden on our roads, schools, medical facilities other infrastructure facilities. I therefore wish to objet to the
plans on this ground.

It is obvious from comparing the site sizes with the number of homes on each that the proposed homes will be both out of
keeping and of a significantly higher density than the current stock of housing in West Horsley. The whole character of the
place will change. Again, I wish to object.

I am most upset at the proposed fuding of the Green Belt to enable Green Belt land in West Horsley to be built upon. The
intention of the Act was that Green Belt land would be protected from development in perpetuity. No exceptional
circumastances or other justification have been cited fro this proposed 'insetting'. Please register my objection on all these
grounds.

From all the above you might conclude that I oppose all change for it's own sake. I do not. I accept that over time, West
Horsley will expand. If it is done organically, over time, and to meet proven needs, then so be it. What I do object to is the
spoiling of the place by increasing the housing stock by some 35%, almost overnight, to meet unproven need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1.0 INTRODUCTION

1.1 I have been a resident of West Horsley since 1992, the year my son was born, and for many years we lived in Northcote
Crescent next door to Raleigh School which my son attended for the full 7 years from Reception right through Key Stage
Two at age 11. I have since 2004 lived in Ripley Lane on the northern perimeter of the village, and my son has now
graduated through university with a masters degree and is in full time employment.

1.2 I have become increasingly concerned and dismayed at the apparent recent and continuing disintegration of the village
of West Horsley as an entity in its own right, and at its becoming more and more reliant on its near neighbour East Horsley
for essentials such as a Post Office, a newsagent, and a convenience store, all of which it has recently lost or is about to l
West Horsley-ites have long had to rely on The Medical Centre and Horsley railway station, both situated in East Horsley,
and both villages have recently lost all high street bank branches other than Lloyds also in East Horsley.

1.3 West Horsley is very much a village in its own right, separate and distinct from East Horsley by virtue of its history and
its semi-rural nature, points amongst others which were made by West Horsley Parish Council in its application to
Guildford Borough Council to be a Designated Neighbourhood Area in 2014, and which was accepted.

1.4 My concerns are now compounded by the prospect of a substantial number of new homes being sited in the village, but
I also very much feel that the Local Plan should now be taken as an opportunity to improve this situation, with particular
emphasis on community needs, spatial connections and inf
2.0 LOCAL PLAN POLICIES

2.1 S1 - Presumption in favour of sustainable development:

2.1.1 I very much support the principle of a sustainable development policy generally, and in West Horsley specifically, which would assist in addressing my concerns for this village in particular as stated above. Key to this is “to secure development that improves the economic, social and environmental conditions in the area”.

2.1.2 My present perception, however, is that the allocation of some 5 key sites for a substantial quantity of new housing within the village, without the attendant proposals for such as community needs, facilities and infrastructure to serve what will be a substantially increased population, would thus over-burden those facilities which do remain and place yet more reliance on the neighbouring village of East Horsley.

2.1.3 There is undoubtedly, in my view, a critical need to look at West Horsley as an inset village as being a place in design and townscape terms, bearing in mind the developments proposed.

2.1.4 The following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

2.2 S2 - Spatial development strategy:

2.2.1 Whilst I applaud and support the statement of intent, I see no evidence in the draft Local Plan of a spatial development strategy for West Horsley itself. Again, the following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

2.3 H2 - Affordable homes:

2.3.1 With both a young adult son and ageing friends and relatives, I absolutely support this policy from both ends of the spectrum - to see a minimum of 40% affordable homes being provided as part of a substantial housing development, and 70% of those being made available for rent, would I feel very much serve the need for local youngsters to stay in West Horsley and for the older generation to downsize and stay in the village.

2.4 H3 - Rural exception homes:

2.4.1 On the same premises, I wholly support this policy which seeks to secure affordable homes in West Horsley for young people and the older generation alike, in perpetuity.

2.5 P2 - Green Belt, limited infilling:

2.5.1 Again I support this policy in the interests of West Horsley, there are to my certain knowledge a selection of suitable sites available in and around the present village settlement boundaries which are not presently allocated for potential housing, but which would meet this criteria.

2.5.2 These additional sites would also be available to provide affordable homes, and/or on a rural exception basis, and to potentially provide community facilities as I have put forward later in this consultation response.

2.6 E9 - Rural local centres:
2.6.1 I question that West Horsley is not nominated as a rural local centre, certainly it has the capacity to be so if a sufficiently sustainable development plan is in place as per the comments I have made elsewhere in this consultation response.

2.7 D1 - Making better places:

2.7.1 The development of sites within West Horsley containing 25+ new homes to be inclusive of a mix of uses, to promote a sense of community, and to provide facilities and services is a policy I will wholly supp

2.7.2 Similarly I will support the creation of meeting places, play and recreation areas, and public spaces, complimentary to acceptable housing developments in West Horsley.

2.7.3 I do not presently see that the objective of facilitating and promoting walking, with short walking distances to and from facilities, is sufficiently addressed in the plans for West Horsley. Again, the following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

2.7.4 Ease of access, promotion of a healthy lifestyle, and safety for pedestrians and cyclists are laudable objectives I do not, however, see them sufficiently addressed in the plans for West Horsley, and there follow some suggestions to potentially address these issues.

2.7.5 There is, in my view, a critical need for a study of West Horsley as a village to go hand in hand with individual site development. The injection of investment into the village should enable positive improvements to be effected to the wider environment, to be achieved through Section 106 agreements. Such improvements are likely to make otherwise potentially controversial developments more acceptable to local people.

2.8 D3 - Historic environment and heritage:

2.8.1 West Horsley benefits from a wealth of history and heritage as I discuss in the following sections of this consultation response. That there is a proposed policy to recognise this has my wholehearted support, but the proposed development of West Horsley should specifically take the opportunity to reclaim and embrace its past.

2.9 D4 - Development in inset villages:

2.9.1 I generally support this policy on a sustainable development basis as before discussed, and in particular the designation of West Horsley as an inset village.

2.9.2 However, the special character of West Horsley, with its north and south settlements either side of the railway line, needs to be looked at carefully to make the most of this opportunity.

2.10 I3 - Sustainable transport for new developments:

2.10.1 I support this policy, but see little evidence of its application in the case of West Horsley. I believe it to be fundamental and crucial, particularly in a semi-rural setting such as West Horsley, that there is infrastructural provision made for walking and cycling, which is very much the national drive towards a healthier and safer lifestyle in this the 21st century.

3.0 TOPIC PAPERS AND STUDIES

3.1 I generally support the changes in the application of Green Belt policies in West Horsley, as set out in the Topic Paper *Green Belt and the Countryside*, provided that the policy of sustainable development is pursued to its full measure.

3.2 Paragraph 120 of the Topic Paper *Housing Delivery* refers to West Horsley (north) as a large village, but it has not been accorded Rural Service Centre status - it is suggested that it instead relies on East Horsley which has been accorded this status. Whilst this is indeed presently the case, it is to be lamented for reasons discussed elsewhere in this consultation response. The application of a sustainable development policy which treats West Horsley as its own entity would lessen the
reliance of West Horsley residents on the facilities of East Horsley, and thus the burden on the latter’s infrastructure and facilities.

3.3 Of particular relevance and importance in the consideration of the development of West Horsley is paragraph 4.117 of the Topic Paper Housing Delivery. To quote verbatim:

Development around villages “can be a sustainable option so long as careful consideration is given to the choice of location, where it can enhance or maintain the vitality of rural communities ... it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years”.

Allied with this objective must be that it is “a sustainable option”, but sustainable it will not be in the apparently present absence of wider considerations of local community needs and infrastructural links.

4.0 HISTORICAL DEVELOPMENT OF WEST HORSLEY

4.1 The 2014 application by WHPC sets out the historical background of the village, which has a traceable history back to 1036AD, and which boasts still remaining buildings going back to the 15th, 16th and 17th centuries. The illustration on the cover page is actually a 19th century map, before the construction of the railway line (which effectively split the village into a north half and a south half), and the following illustration is that same map with the then spine of the village - Silkm more Lane, The Street, and Ripley Lane - highlighted upon it:

[IMAGE 1]

4.2 With the arrival of the railway line came the development of the separate village of East Horsley, also the schism between the north and south sections of West Horsley, as illustrated below:

[IMAGE 2]

4.3 To finally arrive at what is essentially the present built landscape as illustrated below:

[IMAGE 3]

WEST HORSLEY VILLAGE STRUCTURE

5.1 Although a single community, the now two settlement halves of West Horsley are separated on the ground by the presence of the railway line. Its impact on the ground is minimal, it is set within cuttings and largely shielded from view by woodland and trees as broadly illustrated by the satellite view shown below, but its role in the townscape has previously been greatly overstated - assessment from a map necessarily gives a two-dimensional viewpoint, but it does not form a significant boundary.

[IMAGE 4]

The railway line is only perceived to divide the village, and it is this perception that has resulted in the previous definition of the village boundary from a 2D perspective. Given that there are a number of existing houses north of the railway line between Ripley Lane and Silkm more Lane, as well as the substantial facility afforded by Horsley & Send Cricket Club, a more appropriate village boundary here might be the HSCC access road.

5.2 West Horsley is generally well served by sports and recreation facilities, including Horsley & Send Cricket Club off Ripley Lane and Horsley Football Club off Long Reach, and there is a hard court tennis court beside HFC which is available for public use now free of charge. All these facilities serve both junior and adult levels, although there is little recreational facility for senior citizens who might, for example, benefit from the provision of such as a crown green bowling club.
5.3 There is presently no safe pedestrian link between the two halves of the village, and no dedicated cycle route at all. In townscape terms, there is poor village definition without a clear boundary. With its proposed status as an ‘inset’ village within the Green Belt, there is now a great opportunity to provide new definition, also new facilities, with Silkmore Lane resuming its historic role as a spine of the village, and potentially adding an east/west pedestrian and cycle link along the north side of the railway, linking north and south.

5.4 Re-establishing this link could give a basis for new and sustainable developments. The area between the two halves of the village could be used to create a central place with facilities for both areas. The existing location of HSCC could be appended with new community facilities, even retail uses to replace those being lost elsewhere in the village.

6.0 ACCESS AND MOVEMENT

6.1 Pedestrian movement is presently restricted by the lack of footpaths, that which do exist do not provide a satisfactory network within and between residential areas, see the illustration below. Consequently, there is poor access to local facilities, most trips demanding the use of a car. Pedestrian routes should be safe and within a pleasant environment.

6.2 Public transport is somewhat limited, there is a main service along the A246 at the southern end of the village, but an hourly bus service (438) which passes through West Horsley presently runs only on a Monday-Friday basis. Horsley railway station allows good accessibility to London Waterloo and Guildford, but is situated some 2 miles away from the outskirts of West Horsley village.

6.3 Bicycles are generally restricted to main roads, with no dedicated cycle routes in the village. This is somewhat paradoxical in light of West Horsley being part of the 2012 Olympics road race route towards Box Hill, which has as such brought a surge of visitors and interest in cycling to the area, plus the Prudential road race now passes through on an annual basis. It also flies in the face of an otherwise national initiative to encourage cycling as a valid alternative means of transport. As an example, pupils are encouraged by The Raleigh School to cycle there and back but this noble endeavour is frustrated by not being properly or safely facilitated by the local infrastructure. It would be also highly desirable to provide dedicated cycle routes from the residential areas to the railway station for commuter use.

7.0 SITE ALLOCATIONS IN WEST HORSLY

7.1 Given the approach it is now proposed be adopted with the inclusion of West Horsley as an inset village, there exists an opportunity to look at an even wider range of potential sites giving housing development opportunities than has presently been identified, together with allied community facilities and infrastructural links so to achieve sustainable growth. Linking the settlements of north and south West Horsley by pedestrian and cycle routes indicates the possibility of developments such as on land adjacent Horsley & Send Cricket Club. There are, indeed, a number of possible sites with existing road access offering the opportunity for immediate development.

7.2 Site A37 - Bell & Colvill

7.2.1 The only presently allocated site in the southern half of the village, there is a pedestrian walkway down The Street heading north into the heart of the village, but no dedicated cycle route. The existing network of footpaths, etc immediately north of the site and east of The Street offer a good facility down to the railway bridge at the southern end of East Lane, thence there is a well-used public way across to East Horsley and the railway station. The northern half of West Horsley is not nearly so well served.

7.3 Site A38 - Manor Farm:

7.3.1 This site is located in the north half of the village, linking with Long Reach to the west and East Lane to the south - however, Long Reach presently has no pedestrian walkway, and neither road has a dedicated cycle way.

7.4 Site A39 - Ockham Road North:
7.4.1 Although strictly being in East Horsley, this site is also on the north side of the railway line, and is directly adjacent Horsley station. Areas of West Horsley would greatly benefit from a foot/cycle path running alongside this site on the northern side of the railway line to afford easy and safe commuter access to Horsley station.

7.5 Site A40 - Waterloo Farm:

7.5.1 At the northern periphery of the village, this site has a northern link to Green Lane which could feasibly be improved to afford a safe and pleasing route for walkers and cyclists down to Long Reach and Ripley Lane beyond. The southern boundary backs onto Nightingale Crescent and Northcote Crescent but with no way through towards Horsley station, whereby the only feasible direct route is along the busy Ockham Road North, having a pavement on one side but again with no dedicated cycle way.

7.6 Site A41 - Lollesworth Farm:

7.6.1 It is now understood that The Raleigh School have elected to relocate onto this site, which will consequently be unable to accommodate the projected housing provision, but which may free up the existing Northcote Crescent site for some limited housing development. Nevertheless, it would now seem pressing that alternative housing site(s) be found.

7.6.2 This site benefits from close proximity to Lollesworth Lane on the north side of the railway line, a well-trodden pedestrian walkway with its bridge over the railway line, thence down to East Horsley and the railway station. It is, in my view, of critical strategic and infrastructural importance that as much of the northern side of the railway line passing through the village as is possible is utilised as a pedestrian/cycle route, with Lollesworth Lane (opposite the junction of East Lane and Long Reach) acting as a fulcrum point between the north and south parts of West Horsley.

8.0 SUMMARY

8.1 In conclusion, I do broadly support the objectives of the draft Local Plan, but only subject to parallel consideration and implementation of a sustainable development policy running alongside the proposed housing developments in West Horsley, and specifically in address of the following critical factors:

- Approved developments must be sustainable, and which improve the economic, social and environmental conditions in the village.
- Community needs, facilities, and infrastructural links must be accommodated, with a view to self-sufficiency of the village insofar as is feasible.
- There must be a comprehensive spatial development strategy.
- Approved developments must contain a high ratio of affordable.
- Pedestrian and cycle links across and between the two halves of the village, which are fundamental to a healthy and enjoyable lifestyle.
- The preservation and restoration of the history and heritage of the village, and ideally the re-creation of the historic village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [IMAGE 1].jpg (180 KB)
[IMAGE 2].jpg (232 KB)
[IMAGE 3].jpg (260 KB)
[IMAGE 4].jpg (191 KB)
[IMAGE 5].jpg (196 KB)
I have been a resident of West Horsley since 1992, the year my son was born, and for many years we lived in Northcote Crescent next door to Raleigh School which my son attended for the full 7 years from Reception right through Key Stage Two at age 11. I have since 2004 lived in Ripley Lane on the northern perimeter of the village, and my son has now graduated through university with a masters degree and is in full time employment.

I have become increasingly concerned and dismayed at the apparent recent and continuing disintegration of the village of West Horsley as an entity in its own right, and at its becoming more and more reliant on its near neighbour East Horsley for essentials such as a Post Office, a newsagent, and a convenience store, all of which it has recently lost or is about to lose. West Horsley-ites have long had to rely on The Medical Centre and Horsley railway station, both situated in East Horsley, and both villages have recently lost all high street bank branches other than Lloyds also in East Horsley.

West Horsley is very much a village in its own right, separate and distinct from East Horsley by virtue of its history and its semi-rural nature, points amongst others which were made by West Horsley Parish Council in its application to Guildford Borough Council to be a Designated Neighbourhood Area in 2014, and which was accepted.

My concerns are now compounded by the prospect of a substantial number of new homes being sited in the village, but I also very much feel that the Local Plan should now be taken as an opportunity to improve this situation, with particular emphasis on community needs, spatial connections and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
TOPIC PAPERS AND STUDIES

I generally support the changes in the application of Green Belt policies in West Horsley, as set out in the Topic Paper *Green Belt and the Countryside*, provided that the policy of sustainable development is pursued to its full measure.

Paragraph 4.120 of the Topic Paper *Housing Delivery* refers to West Horsley (north) as a large village, but it has not been accorded Rural Service Centre status - it is suggested that it instead relies on East Horsley which has been accorded this status. Whilst this is indeed presently the case, it is to be lamented for reasons discussed elsewhere in this consultation response. The application of a sustainable development policy which treats West Horsley as its own entity would lessen the reliance of West Horsley residents on the facilities of East Horsley, and thus the burden on the latter's infrastructure and facilities.

Of particular relevance and importance in the consideration of the development of West Horsley is paragraph 4.117 of the Topic Paper *Housing Delivery*. To quote verbatim:

Development around villages *ucan be a sustainable option so long as careful consideration is given to the choice of location, where it can enhance or maintain the vitality of rural communities ... it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years*.

Allied with this objective *must* be that it is "a sustainable option", but sustainable it will not be in the apparently present absence of wider considerations of local community needs and infrastructural links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 9412065 / Stephen Bray</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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HISTORICAL DEVELOPMENT OF WEST HORSLEY

The 2014 application by WHPC sets out the historical background of the village, which has a traceable history back to 1036AD, and which boasts still remaining buildings going back to the 15th, 16th and 17th centuries. The illustration on the cover page is actually a 19th century map, before the construction of the railway line (which effectively split the village into a north half and a south half), and the following illustration is that same map with the then spine of the village - Silkmore Lane, The Street, and Ripley Lane - highlighted upon it:

With the arrival of the railway line came the development of the separate village of East Horsley, also the schism between the north and south sections of West Horsley, as illustrated below:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
WEST HORSLEY VILLAGE STRUCTURE

Although a single community, the now two settlement halves of West Horsley are separated on the ground by the presence of the railway line. Its impact on the ground is minimal, it is set within cuttings and largely shielded from view by woodland and trees as broadly illustrated by the satellite view shown below, but its role in the townscape has previously been greatly overstated - assessment from a map necessarily gives a two-dimensional viewpoint, but it does not form a significant boundary.

The railway line is only perceived to divide the village, and it is this perception that has resulted in the previous definition of the village boundary from a 20 perspective. Given that there are a number of existing houses north of the railway line between Ripley Lane and Silkmore Lane, as well as the substantial facility afforded by Horsley & Send Cricket Club, a more appropriate village boundary here might be the HSCC access road.

West Horsley is generally well served by sports and recreation facilities, including Horsley & Send Cricket Club off Ripley Lane and Horsley Football Club off Long Reach, and there is a hard court tennis court beside HFC which is available for public use now free of charge. All these facilities serve both junior and adult levels, although there is little recreational facility for senior citizens who might, for example, benefit from the provision of such as a crown green bowling club.

There is presently no safe pedestrian link between the two halves of the village, and no dedicated cycle route at all. In townscape terms, there is poor village definition without a clear boundary. With its proposed status as an ‘inset’ village within the Green Belt, there is now a great opportunity to provide new definition, also new facilities, with Silkmore Lane resuming its historic role as a spine of the village, and potentially adding an east/west pedestrian and cycle link along the north side of the railway, linking north and south.

Re-establishing this link could give a basis for new and sustainable development. The area between the two halves of the village could be used to create a central place with facilities for both areas. The existing location of HSCC could be appended with new community facilities, even retail uses to replace those being lost elsewhere in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pedestrian movement is presently restricted by the lack of footpaths, that which do exist do not provide a satisfactory network within and between residential areas, see the illustration below. Consequently, there is poor access to local facilities, most trips demanding the use of a car. Pedestrian routes should be safe and within a pleasant environment.

Public transport is somewhat limited, there is a main service along the A246 at the southern end of the village, but an hourly bus service (438) which passes through West Horsley presently runs only on a Monday-Friday basis. Horsley railway station allows good accessibility to London Waterloo and Guildford, but is situated some 2 miles away from the outskirts of West Horsley village.

Bicycles are generally restricted to main roads, with no dedicated cycle routes in the village. This is somewhat paradoxical in light of West Horsley being part of the 2012 Olympics road race route towards Box Hill, which has as such brought a surge of visitors and interest in cycling to the area, plus the Prudential road race now passes through on an annual basis. It also flies in the face of an otherwise national initiative to encourage cycling as a valid alternative means of transport. As an example, pupils are encouraged by The Raleigh School to cycle there and back but this noble endeavour is frustrated by not being properly or safely facilitated by the local infrastructure. It would be also highly desirable to provide dedicated cycle routes from the residential areas to the railway station for commuter use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: capture5.JPG (44 KB)

SUMMARY

In conclusion, I do broadly support the objectives of the draft Local Plan, but only subject to parallel consideration and implementation of a sustainable development policy running alongside the proposed housing developments in West Horsley, and specifically in address of the following critical factors:

- Approved developments must be sustainable, and which improve the economic, social and environmental conditions in the village.
- Community needs, facilities, and infrastructural links must be accommodated, with a view to self-sufficiency of the village insofar as is feasible.
- There must be a comprehensive spatial development strategy.
- Approved developments must contain a high ratio of affordable housing. Pedestrian and cycle links across and between the two halves of the village, which are fundamental to a healthy and enjoyable lifestyle.
• The preservation and restoration of the history and heritage of the village, and ideally the re-creation of the
historic village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 9412065 / Stephen Bray</th>
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Please find attached my further formal consultation response in respect of the above, comprising an alternative site allocation proposal, hard copy to follow.

Alternative Site Proposal: Bridge Cottage and Land Behind Ripley Lane, West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [160712 consultation response (2).pdf](#) (3.5 MB)

<table>
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Site A37 - Bell & Colvill

The only presently allocated site in the southern half of the village, there is a pedestrian walkway down The Street heading north into the heart of the village, but no dedicated cycle routes. The existing network of footpaths, etc immediately north of the site and east of The Street offer a good facility down to the railway bridge at the southern end of East Lane, thence there is a well-used public way across to East Horsley and the railway station. The northern half of West Horsley is not nearly so well served.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A38 - Manor Farm:

This site is located in the north half of the village, linking with Long Reach to the west and East Lane to the south - however, Long Reach presently has no pedestrian walkway, and neither road has a dedicated cycle way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2623  Respondent: 9412065 / Stephen Bray  Agent:

Site A39 - Ockham Road North:

Although strictly being in East Horsley, this site is also on the north side of the railway line, and is directly adjacent Horsley station. Areas of West Horsley would greatly benefit from a foot/cycle path running alongside this site on the northern side of the railway line to afford easy and safe commuter access to Horsley station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2624  Respondent: 9412065 / Stephen Bray  Agent:
Site A40 - Waterloo Farm:

At the northern periphery of the village, this site has a northern link to Green Lane which could feasibly be improved to afford a safe and pleasing route for walkers and cyclists down to Long Reach and Ripley Lane beyond. The southern boundary backs onto Nightingale Crescent and Northcote Crescent but with no way through towards Horsley station, whereby the only feasible direct route is along the busy Ockham Road North, having a pavement on one side but again with no dedicated cycle way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2625  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A41 - Lollesworth Farm:

It is now understood that The Raleigh School have elected to relocate onto this site, which will consequently be unable to accommodate the projected housing provision, but which may free up the existing Northcote Crescent site for some limited housing development.

Nevertheless, it would now seem pressing that alternative housing site(s) be found.

This site benefits from close proximity to Lollesworth Lane on the north side of the railway line, a well-trodden pedestrian walkway with its bridge over the railway line, thence down to East Horsley and the railway station. It is, in my view, of critical strategic and infrastructural importance that as much of the northern side of the railway line passing through the village as is possible is utilised as a pedestrian/cycle route, with Lollesworth Lane (opposite the junction of East Lane and Long Reach) acting as a fulcrum point between the north and south parts of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5875  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
D1 - Making better places:

The development of sites within West Horsley containing 25+ new homes to be inclusive of a mix of uses, to promote a sense of community and to provide facilities and services is a policy I will wholly support.

Similarly I will support the creation of meeting places, play and recreation areas, and public spaces, complimentary to acceptable housing developments in West Horsley.

I do not presently see that the objective of facilitating and promoting walking, with short walking distances to and from facilities, is sufficiently addressed in the plans for West Horsley. Again, the following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

Ease of access, promotion of a healthy lifestyle, and safety for pedestrians and cyclists are laudable objectives. I do not, however, see them sufficiently addressed in the plans for West Horsley, and there follow some suggestions to potentially address these issues.

There is, in my view, a critical need for a study of West Horsley as a village to go hand in hand with individual site developments. The injection of investment into the village should enable positive improvements to be effected to the wider environment, to be achieved through Section 106 agreements. Such improvements are likely to make otherwise potentially controversial developments more acceptable to local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5876 Respondent: 9412065 / Stephen Bray Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

D3 - Historic environment and heritage:

West Horsley benefits from a wealth of history and heritage as I discuss in the following sections of this consultation response. That there is a proposed policy to recognise this has my wholehearted support, but the proposed development of West Horsley should specifically take the opportunity to reclaim and embrace its past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5877 Respondent: 9412065 / Stephen Bray Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
D4 - Development in inset villages:

I generally support this policy on a sustainable development basis as before discussed, and in particular the designation of West Horsley as an inset village.

However, the special character of West Horsley, with its north and south settlements either side of the railway line, needs to be looked at carefully to make the most of this opportunity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5874  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E9 - Rural local centres:

I question that West Horsley is not nominated as a rural local centre, certainly it has the capacity to be so if a sufficiently sustainable development plan is in place as per the comments I have made elsewhere in this consultation response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5869  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
H2 - Affordable homes:

With both a young adult son and ageing friends and relatives, I absolutely support this policy from both ends of the spectrum - to see a minimum of 40% affordable homes being provided as part of a substantial housing development, and 70% of those being made available for rent, would I feel very much serve the need for local youngsters to stay in West Horsley and for the older generation to downsize and stay in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5872   Respondent: 9412065 / Stephen Bray   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H3 - Rural exception homes:

On the same premises, I wholly support this policy which seeks to secure affordable homes in West Horsley for young people and the older generation alike, in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5879   Respondent: 9412065 / Stephen Bray   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I3 - Sustainable transport for new developments:

I support this policy, but see little evidence of its application in the case of West Horsley. I believe it to be fundamental and crucial, particularly in a semi-rural setting such as West Horsley, that there is infrastructural provision made for walking and cycling, which is very much the national drive towards a healthier and safer lifestyle in this the 21st century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5873  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 - Green Belt, limited infilling:

Again I support this policy in the interests of West Horsley, there are to my certain knowledge a selection of suitable sites available in and around the present village settlement boundaries which are not presently allocated for potential housing, but which would meet this criteria.

These additional sites would also be available to provide affordable homes, and/or on a rural exception basis, and to potentially provide community facilities as I have put forward later in this consultation response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5866  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

S1- Presumption in favour of sustainable development:

I very much support the principle of a sustainable development policy generally, and in West Horsley specifically, which would assist in addressing my concerns for this village in particular as stated above. Key to this is "to secure development that improves the economic, social and environmental conditions in the area".

My present perception, however, is that the allocation of some 5 key sites for a substantial quantity of new housing within the village, without the attendant proposals for such as community needs, facilities and infrastructure to serve what will be a substantially increased population, would thus over-burden those facilities which do remain and place yet more reliance on the neighbouring village of East Horsley.

There is undoubtedly, in my view, a critical need to look at West Horsley as an inset village as being a place In design and townscape terms, bearing in mind the developments proposed.

The following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5868  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

S2 - Spatial development strategy:

Whilst I applaud and support the statement of intent, I see no evidence in the draft Local Plan of a spatial development strategy for West Horsley itself. Again, the following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1142  Respondent: 9437921 / Grace Ashby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Concern about the location off the main road. There was a fatal car accident very close to this proposed site and another car ran off the road. There is already 2 traveller sites further up the road less than half a mile away. At this existing site - the roadside oak trees were destroyed a dangerous access onto the road created and permanent homes. Anything of the same on this site would destroy the local environment, and be lethal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1143  Respondent: 9437921 / Grace Ashby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A52

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This is green belt and woodland. Trees were destroyed, a dangerous access road built, permanent housing erected and infrastructure put in, at a great deal of inconvenience to traffic (large tail backs for weeks when infrastructure was being installed).

All without planning permission. Land again is being cleared on the corner and mounds of earth there currently, which are not in keeping with the area. By officially allocating this site - you are making a statement that it is acceptable to do what you wish with the land and there is no consequence. Given the increase in allocation for travellers being proposed [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

There should be equal opportunities for all - this is positive discrimination. This is not legal to not conform with laws and restrictions. This would not be permitted for any other group.

This is not co-operation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I do not think this plan is sound as the volume of increase in housing is not adequately supported by the current road network.

Additional junction on the A3 will help congestion through Guildford, but the volume of traffic already causes significant congestion on the A3, hogs back and A323.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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2.39 The Government has adopted a clear stance of moving away from locally set standards in respect of renewable energy for housing schemes, with such matters instead addressed through the Building Regulations. As such we are concerned that the policy is unsound in that it is not consistent with national policy. In addition we have concerns regarding the practicality of implementing certain of the detailed criteria currently proposed as discussed below.

Sustainable Development

2.40 Criterion 1b requires the sustainability statement to set out how the development will deliver “the lowest level of carbon emissions (direct and embodied).” Similarly, criterion 1c requires “the highest levels of energy and water efficiency.” As currently it is considered that the proposed policy wording is ineffective.

2.41 No clarity is provided as to what constitutes the lowest or highest levels. For instance, should a new form of emerging technology be able to deliver a lower level of carbon emissions but this is not currently widely available this would seemingly fail the currently proposed policy test. Similarly if there is a form of technology available but this would be prohibitively expensive and would render the development unviable, this would again fail the proposed policy test. Further clarity and flexibility must therefore be introduced to the proposed policy wording.

Renewable, low carbon and decentralised energy

2.42 The policy requires all new developments to “connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable.”

2.43 Clearly (C)CHP is unlikely to be delivered in all locations. The proposed policy wording does provide some flexibility in respect of demonstrating if it is feasible, however this test needs to be applied to the site itself and the wider context. Whilst it may be feasible for the development to provide the necessary infrastructure for connection to future networks, if it can be robustly demonstrated that the location in general is not feasible for a future network to be delivered then this should equally apply. The proposed policy text should be updated to clarify this approach.

Carbon reduction

2.44 The policy also seeks to require new buildings to achieve a reduction in carbon emissions of at least 20%. If the principle of this requirement is accepted, we continue to have concerns regarding the potential implications for the viability of developments. Whilst the implications of the proposed increase to 20% have been assessed in the Assessment of the Viability of Carbon Emission Targets for New Builds (April 2017) prepared by Evora Edge, this has not been considered in combination with the other proposed revised policy requirements through an updated viability assessment. The current requirement is therefore considered to be unsound in that it is neither justified nor effective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:   pslp171/1015   Respondent: 9444929 / Markfield Investments   Agent: Turley (Donna Palmer)

Document:   Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Accessible Homes

2.22 The revised policy wording seeks to include the following requirement:
“On residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.”

2.23 The NPPG makes clear that it is for LPAs to demonstrate the need for these requirements. It is considered that insufficient evidence has been provided by the Council to justify these requirements. The only justification provided by the Council relates to generic comments from the SHMA and Addendum SHMA regarding the ageing population in the Borough. Based on the currently available evidence it is considered the requirement is unsound.

2.24 Furthermore, whilst the supporting text at paragraph 4.2.10 indicates that there will be a degree of flexibility as to how the requirements are applied, this is not reflected in the policy wording. Whilst the principle of the flexibility is supported, concern is also raised regarding the proposed wording which currently states that the requirement will only be relaxed “where substantial evidence is provided to justify an exception.” Clearly this requirement is inappropriate and is not the correct test to be applied. Flexibility should be allowed where proportionate evidence is provided which clearly justifies an exception. This justification could relate to viability grounds as well as whether a need for the provision to be made on the site can be identified or not.

Self-build and custom housebuilding

2.25 The Policy seeks to require the provision of plots for self-build and custom housebuilding by introducing the following requirement:
“Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.”

2.26 As currently drafted it is unclear whether the requirement to have no adverse effect on the local character relates to the self/custom build element itself or the wider proposals. In any event it is considered that this wording is inappropriate as it seeks to apply a definitive test which does not allow for application of the planning balance. Whilst proposals should seek to have no adverse effect on the local character any harm should be weighed against the benefits of the proposals. Furthermore given the nature of self/custom build, the potential effects on the local character will not be able to be assessed definitively at the point of determination of an application for the wider development site. As currently drafted, concern is raised that the necessary lack of certainty of the effects of these plots may prevent the approval of applications for the wider site if this policy wording is to be rigidly applied.

2.27 The PPG makes clear that the Local Planning Authority must assess the local demand for self-build housing. The PPG advises:
“Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes” (ID 2a-020-20140306).

2.28 Whilst the Council’s website provides details of how to apply to be on the register, including details of a recent consultation on revised eligibility criteria, there are no details as to the number of people currently on this register. As such it considered that there is insufficient information to justify the requirement currently proposed.

2.29 Furthermore, whilst we agree that custom and self-build may be appropriate for some schemes, we do not consider that large strategic sites are an appropriate location and are unlikely to be taken up. The policy wording does specify that plots are only required to be made available and marketed for a period of 18 months, before, we assume as this is not explicitly stated in the policy wording, reverting to the developer. It is however considered that this will delay the delivery of the scheme, create uncertainties in the build programme for developers and potentially add additional costs as a result of abortive work.
2.30 Whether or not the percentage requirement of custom/self-build housing is amended, should the be Council be minded to retain a requirement for all housing developments of 100 or more dwellings, we consider that the words “subject to viability” should be added to the policy to provide suitable flexibility. It is considered that the requirement for delivery of self and custom build plots at an early stage will add to the potential viability implications given the early delivery of units is generally required in order to fund necessary supporting infrastructure works. Furthermore, as raised above, if these plots do then revert to the developer due to lack of interest, this would likely lead to additional costs due to changes to the build programme etc.

2.31 It is noted that the supporting text to the policy states that: “Higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots.”

2.32 The wording of the supporting text is not reflected in the Policy wording itself as currently drafted. Furthermore there is no clarity on the Council’s definition of higher density and how this would be applied to developments which contain a mix of houses and flats.

2.33 As currently drafted this requirement is considered to be unsound in that it is not justified, effective or consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

2.34 The Policy seeks sites of 5 or more homes, or 0.17ha or more, to provide at least 40% affordable housing. There is a significant need for affordable housing in the Borough and this is supported by the Council’s evidence base. A Local Plan and CIL Viability Study (October 2016) has been prepared by Peter Brett Associates on behalf of the Council. The Study concludes that: “Based on the assessment of the policy requirements within the Guildford Borough Proposed Submission Local Plan (June 2016) review, it is considered that the current Plan would not unduly burden the delivery of residential and non-residential development in Guildford borough.”

2.35 No updated assessment has been undertaken to support the current Local Plan consultation and the revised policy requirements. This is considered to be a significant flaw particularly in light of the proposed additional requirements in respect of accessible homes and custom and self-build housing. An updated Study should be commissioned to ensure the proposed policy is justified and effective in light of the revisions proposed to the Local Plan under the current consultation.

2.36 In addition, it is considered that flexibility should be introduced to the proposed policy wording to allow for site specific circumstances where the proposals may be rendered unviable by the level of affordable housing sought. This is particularly likely to be the case where there are non-standard infrastructure requirements to support the development or potential contamination on site. The policy wording should therefore be updated to require provision of at least 40% affordable housing, subject to viability. It is noted that such a mechanism is advocated in paragraph 4.2.40 of the supporting text but not reflected in the policy wording itself.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1014  Respondent: 9444929 / Markfield Investments  Agent: Turley (Donna Palmer)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing Requirement

2.1 The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

2.2 The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

2.3 The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

2.4 It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

2.5 As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

2.6 The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

2.7 At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities. In particular Woking’s Core Strategy (2012) sets out its housing requirement as 292 dpa, some 225 dpa below the OAN as established in the 2015 West Surrey SHMA.

2.8 Notably this issue has been specifically considered by the Inspector at the recent Waverley Local Plan EIP hearing sessions. During these hearings, the Inspector clearly indicated that he considered it appropriate for Waverley and
Guildford to accommodate the unmet need from Woking. From our involvement in the Waverley Local Plan sessions it is expected that Waverley will be required to accommodate at least 50% of the unmet need from Woking, which amounts to 83dpa. Whilst recognising that the Guildford Local Plan would be examined separately and it would be for that Inspector to draw their own conclusions, the Inspector considering the Waverley Local Plan suggested that Guildford adopt a similar approach to take account of Woking’s unmet housing need. We would endorse the Inspector’s comments and recommend Guildford increase their housing requirement to include a proportion of Woking’s unmet needs.

2.9 If the reduced OAN for Guildford itself can be justified through the SHMA addendum (although as discussed we have concerns regarding the soundness of this approach) then consideration should have been given in any event to the ability of the Borough to meet the unmet needs of adjoining authorities, in particular Woking, before the Council decided to reduce its housing target. It is apparent that this approach has not been followed.

2.10 The importance of the duty to cooperate has been further reemphasised by the recent St Albans City and District Council decision ([2017] EWHC 1751 (Admin)). In reaching his judgment, the Judge highlighted that: “Further, I accept the Secretary of State’s submission that once there is disagreement, I would add even fundamental disagreement, that is not an end of the duty to cooperate, especially in an area such as housing markets and housing need which involve as much art as science, and in which no two experts seem to agree. … the duty to cooperate is active, and on-going, and that to my mind means active and on-going even when discussions seem to have hit the buffers.”

2.11 Paragraph 4.1.9a of the Local Plan states: “The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.12 Clearly therefore there is no justification to restrict the housing requirement on the basis of housing supply. As such it is considered the Plan should make provision for its full OAN and explore its ability to accommodate the needs of adjoining authorities. Additional allocations should be made to meet this requirement. At the current time the plan is considered to be unsound in that it is not justified, effective, positively prepared or consistent with national policy.

The phasing of development as set out in the Annual Housing Target table

2.13 We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

2.14 The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

2.15 The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2-236/2027). Far from dealing with an undersupply in the first five years of the Plan period, the
Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequentially this raises concerns over whether any accrued shortfalls can be resolved.

2.16 If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

2.17 Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

2.18 The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

2.19 Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though if the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

2.20 We note that paragraph 4.1.9a of the Proposed Submission Local Plan states: “This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.21 We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
3.1 These representations should be read in the context of the opportunities for the site to be delivered as a comprehensive development in association with the former allocation at ‘land adjoining Fairlands’. The site itself has not been identified at any previous stage of the Local Plan process, although it is located directly to the south of the former safeguarded allocation at Fairlands which was considered within the Regulation 18 Local Plan consulted on in July 2014.

3.2 Our client’s landholding ‘Land at Dunmore Farm’ comprises 31.69 hectares of land as submitted in previous representations to the Local Plan. The site currently comprises farmland and paddocks with a limited number of existing buildings in the south eastern corner around Dunmore Farm. The site wraps around the former safeguarded allocation to the south-west, south and south-east of Wood Street village. The field parcels themselves are relatively clear internally with trees and hedgerows indicating the majority of the boundaries.

3.3 The site was considered as part of parcel H8 which extended northwards between Wood Street village and Fairlands within the Green Belt. Whilst the site was considered to be of high sensitivity, Volume II of the Green Belt and Countryside Study discusses that there are ‘opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt’. It is clear from the assessment that the main purposes of the Green Belt within this location are to:
- Check southwards sprawl of Fairlands and northward sprawl of Wood Street Village;
- Prevent Fairlands and Wood Street village from merging;
- Assist in safeguarding the countryside from encroachment; and
- Preserves the setting of Wood Street conservation area.

3.4 In this regard, given development opportunities clearly exist to the west and south of Fairlands and were supported through a previous iteration of the Local Plan, the opportunity to create a more comprehensive extension incorporating the site to the north of Wood Street village would assist in delivering a significant quantum of homes, incorporating an appropriate and extensive landscape buffer between the two villages to ensure a defensible and permanent boundary to both villages.

3.5 The creation of a new permanent open area of land between the two settlements could deliver far greater benefits as public access could be provided along with the potential for outdoor sport and recreation which would permanently benefit the residents of both villages and the wider Borough. As such, this would ensure that the requirements of paragraph 81 are met, ensuring that the Green Belt is open and permanent and provides a beneficial use whilst also meeting the five purposes of the Green Belt as stated at paragraph 80 of the NPPF.

3.6 Alternatively, GBC should consider the opportunities to deliver smaller scale development at sustainable settlements such as Wood Street village, in locations where the impact on the function of the Green Belt would be minimised and opportunities to incorporate functional and accessible Green Belt land could be explored.

3.7 As such, GBC should consider further the relationship of Fairlands with Wood Street village to realise the large scale opportunities for mixed use development within this area whilst reinforcing the quality and usefulness of the Green Belt between the two settlements. The delivery of new development could facilitate securing the permanence and openness of the Green Belt between the settlements and to ensure its use is enhanced and is beneficial to the local community as set out at paragraph 81 of the NPPF.

3.8 Throughout the plan process to date, our client has supported the inclusion of the Fairlands allocation within the plan, although wishes to further emphasise the wider opportunities for the area if the site were to be considered alongside Fairlands for allocation within the Local Plan.
- A comprehensive development that would provide not only market but affordable housing to meet the needs of the Borough and any unmet requirements from Woking Borough;
- Deliver a comprehensive masterplan that could incorporate a defensible landscape buffer which would ensure the permanent separation of the villages of Fairlands and Wood Street village by creating new defined edges to the settlements. This would reinforce the findings of the Green Belt Study 2013;
- Direct new development in a sustainable location in line with the settlement hierarchy and enhancement local facilities and public services;
- Provide new development in locations where growth will be required to support the continued economic growth of Guildford as a town centre;
- The potential to incorporate appropriate Suitable Alternative Natural Greenspace to offset the proximity of the site to Thames Basin Heath SPA.

Conclusion
4.1 These representations have been prepared by Turley on behalf of Markfield Investments Ltd in respect of the Guildford Borough Proposed Submission Local Plan (June 2017). The consultation is targeted to the proposed changes to the Plan since the 2016 consultation and the revised evidence base documents.

4.2 Our client has important land interests in the Local Plan area, in particular at Dunmore Farm, Guildford. As such this response focuses on issues which particularly affect the site.

4.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly. In summary our submissions are:

- Policy S2 – The Council should endeavour to meet its full OAN and seek to assist in meeting the needs of adjoining authorities, in particular Woking Borough Council, where possible.
- Further allocations should be made to provide flexibility in the delivery of the Plan and to meet the required increased housing requirement.
- Policy H1 – Insufficient evidence has been provided to justify the Council’s proposed requirement in respect of accessible homes.
- Concern is raised as to whether the requirements for self-build and custom housebuilding are justified and effective.
- Policy H2 – The proposed affordable housing requirement is not underpinned by a robust and up to date viability assessment and as such is considered to be unjustified.
- Policy P5 – Whilst we have no specific comments on the policy wording itself, we would highlight the importance of ensuring sufficient land is allocated for SANG to enable the delivery of the Plan.
- Policy D2 – Further clarity is required to ensure the proposed policy wording is effective. Flexibility should also be introduced into the proposed policy wording.
- Dunmore Farm – we consider the site presents an opportunity for an additional allocation to help assist in meeting the Borough’s housing needs and the unmet needs of Woking Borough. The site would be capable of delivering an associated SANG which could provide capacity for other proposed developments in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/423  Respondent: 9554401 / Mrs Symonds  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I still object to the Local Plan in spite of some small changes as it will result in the destruction of the beautiful and historic Lovelace village of East Horsley, and those of West Horsley and Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPS16/148  Respondent: 9557825 / Richard Powell  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Site A25 / Gosden Hill**

1. I object to this proposal. I am again concerned about the scale of this development and the pressure it would put on local services (education & health). I also question the impact this number of additional people will place on A3 congestion (North & Southbound).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/147  Respondent: 9557825 / Richard Powell  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I’d like my comments below to be taken into consideration for the GBC local plan:

**Site A35 / Wisley Airfield**

1. I object to this proposal. I objected to this site in 2014 and my views are unchanged. This is a significant development which is not appropriate for the area. It is a greenbelt site and should be kept as such. I find the plan to build 2000 houses is unacceptable and completely at odds with surrounding land use.

2. In addition such a huge volume of housing will add to the already significant access issues to the M25 / J10 and A3. It would also create unacceptable traffic congestion / “rat runs” on the surrounding minor roads.

3. I am very concerned about how local services from education to healthcare could cope with such a large additional population in the area. I question whether this has been properly taken into account and incorporated into the GBC plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/149  Respondent: 9557825 / Richard Powell  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 / Garlick’s Arch

1. I object to this proposal. In isolation I would welcome the provision of a 4 way access to the A3 at Burnt Common as part of this development. However I feel very uncomfortable about the plan for this development alongside sites A35 & A25. This would create a band of housing development totalling 4400 properties in a ribbon running from M25 / J10 to Guildford on land that is greenbelt.

2. I am particularly worried about the traffic management around the Burnt Common area. This is already a busy junction with the Portsmouth Road and with potentially additional traffic from Woking, Clandon as well as those travelling north & south on the A3. I fear this would become a major bottleneck.

Please will you take my comments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1166  Respondent: 9577857 / Nick Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to this development. I have detailed my objections previously to cover;

- loss of local amenity to surrounding villages and visitors - green spaces, space to breathe
- loss of semi-rural character to surrounding villages and the county - countryside, undeveloped locations
- saturation of local transport services (roads, trains, buses) for the current population by new residents - the roads are insufficient (size, layout, character) to deal with the increased volume of traffic which will be produced; there are no footpaths adjacent to majority of the roadways to encourage walking / cycling; train carparks are already full
- saturation of existing services (clubs, shopping, education, health) for current population by new residents - health services are over-subscribed, schools are full, clubs maintain waiting lists; shops are large enough for the current populations but not for new developments - more people means larger shops, means more traffic, means more urbanisation
- permitting the development will mean the precedent will be introduced which will reduce ability to object to future development in the locality, encouraging and permitting infill development between and around the existing villages (Ockham, Ripley, Horsleys, Effingham, Wisley)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1170  Respondent: 9577857 / Nick Wilkinson  Agent:
<table>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to this development based on the density and impact on the centre of the village and direct impact this will have on the area. My reasoning;</td>
</tr>
<tr>
<td>-The village is congested at key times in and around the shops and station and this will increase that congestion. In addition this will increase the pressure on local amenities and services, already at capacity in some cases to handle the current population. This development will have a negative impact on capacity</td>
</tr>
<tr>
<td>-The development also creates the precedent to allow large size developments on village green spaces; the mitigation of allowing Green corridors to allow wildlife is not needed if the site remains undeveloped</td>
</tr>
<tr>
<td>-The development also results in the playing fields being entirely encircled, which is a clear indication this area will be approved for development in future; this is a further loss of amenity (currently used by the Raleigh School and other groups</td>
</tr>
<tr>
<td>-The current transport provision is at capacity, with station carparking full, inadequate retail parking, limited on-street parking; I do not want to a development which necessitates the increase in parking under tarmac to meet the demands of more traffic</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to this development on the grounds of loss of green space, development on the Green Belt and increased urbanisation in a low population area, leading to increased traffic, demand for over-subscribed local services.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</table>
I do not support the increased development of the Green Belt, as it exists in and around Surrey, to this level in proposed in the Plan documents. Specifically but not only, I object to the following areas of development (generally and not specifically);

- **Ockham / Wisley Airfield** - I object to the imposition of a new village development of this scale and the corroborating assumptions. This is based on a number of factors, including but not restricted to transport, amenity, retail, schooling, environmental, density, local roads, impact on current services and villages. The local roads are insufficient to cope with increased residential and delivery traffic
  - the assumption that the population will travel by bike hire scheme to use the local trains is laughable
  - the impact on demand for local services and clubs deleterious to current provision (current residents are on waiting lists - what happens when 4-5000 more people land...?)
  - this will be the start of the in-fill of the land between all the villages (Ockham, Horsleys, Effingham) with a loss of amenity, environment, local character and the increase in pollution, waste, traffic, nuisance, inconvenience, urbanisation and irretrievable loss of Green Belt

- **Development in The Horsleys** - I object to the significant number and increased provision of sites for medium / large scale housing projects in an around The Horsleys. There is insufficient capacity to absorb new developments in the area and it should not be acceptable for mass housing to be imposed in an area where public opinion is against it. The Horsleys are not a large metropolitan area, they do not have the services of a town or Cranleigh-size village and nor do they want them; by continuing to encourage concentration and development in and around these villages, the Council is agglomerating Effingham, The Horsleys, Bookham. Fetcham, Ockham into an homogenous residential area attached to Leatherhead, destroying the character of the Green Belt and passing the point of no return, by which time any control or restrictions on development are futile and the area becomes a suburban ribbon from London and Leatherhead / Guildford

I am opposed to the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I support a new community at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1560  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Garlicks Arch] It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity?

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1566  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements of which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1567   Respondent: 9607905 / Anne Pascoe   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to (to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2920   Respondent: 9607905 / Anne Pascoe   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Claridon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary everyday during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Crandon, a road where large lorries mount the pavement virtually everyday and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked everyday.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "inspiration" in the local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

- **Comment ID:** PSLPS16/2942  **Respondent:** 9607905 / Anne Pascoe  **Agent:**
- **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
15. I OBJECT, to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2950  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station with in reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2975  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/all ramps at Burnt Common

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and
Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6337</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6436</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<p>| Comment ID: PSLPP16/6301 | Respondent: 9607905 / Anne Pascoe | Agent: |</p>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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5. I OBJECT to the sustainable employment policy

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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6. I OBJECT to the location for new employment floorspace at Garlick's Arch-Site A43

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>7. I OBJECT to the loss of rural employment</td>
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<tr>
<td>PolicyE5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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**Comment ID:** PSLPP16/6454  
**Respondent:** 9607905 / Anne Pascoe  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The leisure and visitor experience</td>
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<tr>
<td>I OBJECT Tourism and visitors do not depend on new visitor &quot;attractions&quot; and could actually be damaged by them, as compellingly argued in the current debate over Newtands Corner. In this policy, the presumption in favour of development runs the risk of becoming all excuse or overdevelopment / &quot;Disneyfication&quot;. Heritage sites and the Green Belt are particularly vulnerable to harm.</td>
</tr>
<tr>
<td>Guildford has many &quot;leisure and visitor attractions&quot; already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:</td>
</tr>
<tr>
<td>1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the over crowded South-East of England, lack of development is a leisure and tourism asset, not a liability</td>
</tr>
<tr>
<td>To help make Guildford's river landscape less off-putting and support to town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.</td>
</tr>
<tr>
<td>To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An &quot;English town break&quot; (including B&amp;B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and...</td>
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</table>
a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 9607905 / Anne Pascoe</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

13. I OBJECT Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparator boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3-Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6339 | Respondent: 9607905 / Anne Pascoe | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

9. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6344 | Respondent: 9607905 / Anne Pascoe | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6353  Respondent: 9607905 / Anne Pascoe  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I OBJECT to the lack of proper infrastructure planning for sites

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick's Archsite (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering
from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6360  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A351, Garlick's Arch(A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6365  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. I OBJECT to poor air quality concerns

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6256  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to not protecting the Green Belt

I OBJECT to the proposals to remove the villages of Ripley, Sendand Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6431  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Garlick's Arch has previously been protected from development as GreenBell. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB). There are no exceptional circumstances which allow for the removal of this land from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6433  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Archsite. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6285  **Respondent:** 9607905 / Anne Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding

National Planning Policy states that local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's floodmap as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2, having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am well aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6435  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6197  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. OBJECT to the Local Plan as the development proposed will not be sustainable (policy 51) The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M2S, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport option scan be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border)(A43) and Gosden Hill (Clandon)(A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of lovelace, Send and Clandon & Horsley. Whilst at present these three wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to protest regarding the proposed local plan which will affect West Clandon. I live on The Street (A.247) and this road is already full to capacity. If this proposed plan goes through we will have grid-lock as the A.247 cannot take any more traffic. The road is very narrow in places which necessitates trucks having to mount the pavement to pass each other. There is a school close by, which means a major accident is very likely, especially when parents are attempting to accompany their children to school. The infrastructure needs to be put in place before such a plan can be instigated.

You are proposing to build 2,100 houses at Garlick Arch and Gosden Hill as well as a further 2,000 at Wisley etc., etc. Each of those properties will have at least two cars, possibly more and therefore, the roads will become impassable. The A.3. is already at a standstill on a daily basis but is expected to take on even more traffic. You are proposing to build an Industrial site on the Burnt Common areas – this will mean yet more heavy duty vehicles using both the A.3. as well as the A.247.

I fully appreciate more homes are required but these need to be built on brown field sites and to be affordable to the younger generation and not Executive type homes. This is an area of Outstanding Natural Beauty and needs to be maintained as well as the Green Belt which appears to be slowly eroded by such plans. Infrastructure needs to be a priority before any of these proposed plans can be instigated and I implore you to give this priority consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp173/151 | Respondent: 9607905 / Anne Pascoe | Agent: |
I am writing to protest regarding the proposed local plan which will affect West Clandon. I live on The Street (A247) in West Clandon and this road is already full to capacity. If this proposed plan goes through we will have grid-lock as the A247 cannot take any more traffic. The road is very narrow in places, which necessitates trucks having to mount the pavement to pass each other and there being a school close by, means a major accident is very likely, especially when parents are attempting to accompany their children to school. The infrastructure needs to be put in place before such a plan can be instigated.

You are proposing to build 2,100 houses at Garlick Arch and Gosden Hill as well as a further 2,000 at Wisley etc., etc. Each of those properties will have at least two cars, possibly more and therefore the roads will become impassable. The A3. is already at a standstill on a daily basis but is expected to take on even more traffic. You are proposing to build an Industrial site on the Burnt Common areas – this will mean yet more heavy duty vehicles using both the A3. as well as the A247.

I fully appreciate more homes are required but these need to be built on brown field sites and to be affordable to the younger generation and not Executive type homes. This is an area of Outstanding Natural Beauty and needs to be maintained as well as the Green Belt which appears to be slowly eroded by such plans. Infrastructure needs to be a priority before any of these proposed plans can be instigated and I implore you to give this priority consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **POLICY A22: Land north of Keens Lane, Guildford**
  
  I do not support the size of the site at the land north of Keens Lane, Guildford for the western end of this site heavily encroaches on the existing properties in Keens, Tangle and Gravetts Lane. I would support this site if it was reduced in size to address my concern.

  I have concerns with the amount of traffic that will be created on Keens, Tangle and Gravetts Lane as a result of this site. All of those roads are very small and not designed for the increase that would result. The site would be better served by a single access road from the A322 Worplesdon Road and would support this site if this was the case.

  - I am grateful to see the removal of the sites at Liddington Hall and Fairlands as I did not support them in the previous local plan for numerous reasons.

Other than the points I have highlighted I have no objection and support of rest of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/561  Respondent: 10223105 / Vincen Watson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I support the location of the larger sites, Gosden Hill, the former Wisley airfield, Blackwell Farm and Normandy/Flexford as each has good access to the A3/A31 and railway lines. I especially support the Wisley airfield site as this is clearly brownfield and is perfect for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3298  Respondent: 10260769 / Keith Witham  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs,

I object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained and not built on. I am appending at the end of this email* the agreed Policy of Surrey County Council for your reference and urge that the green belt be protected by Guildford Borough Council.

2. Keens Lane is a narrow road (the word "lane" is a clue) and building more homes there would entail the widening of the road, but this does not account for the fact that at the far end, near to Gravetts Lane/Tangley Lane, is constricted and the area is already congested,

3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained.

* It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

**Surrey County Council, March 2013**

**RESOLVED (unanimously):**

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

1. The Coalition Agreement states:

   ‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs – to protect green areas of particular importance to local communities.’

Council believes:

Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:

1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**FROM COUNTY COUNCILLOR KEITH WITHAM**

Response to GBC Draft Local Plan Consultation - June 2016

GBC Draft Borough Plan re Normandy - Site Allocation 46 and Site 47

**SECONDARY SCHOOL AT NORMANDY (SITE 46-47 GBC DRAFT PLAN)**

The proposed site of Normandy/Flexford for a new Secondary School should be rejected as the need for such a school in that location has not been proven.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford." Why has GBC not heeded this advice?

I have highlighted below that every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied. The birth rate which rose in 2011 and 2012 has reduced for the last two years, so building new schools now seems very foolhardy.

The addition of forms of entry to current schools will be a much more cost effective and sustainable in the long term if there is a reduction in need – an empty classroom is cost neutral in terms of annual budgets, but an empty or only part subscribed school is unsustainable, having spent £millions on creating it would be a huge waste of money

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms – but they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to co-operate with a programme to expand that school, as had the Principal at Kings College - although now undersubscribed significantly, if it needs expansion in the future there is space and a willingness to do so.

If GBC wishes to proceed with this proposal, SCC Education Officers need to demonstrate a clear, and undisputed need for such a school at this location, given the current under-subscription of all the neighbouring local secondary schools surrounding Normandy.

It should also set out how such a school will be financed. If not, the site should be rejected.

**Undersubscribed Secondary Schools**
Kings College, Guildford. The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. Kate Carriett, Principal at Kings College has said very clearly and I quote: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College IS fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

Christ's College is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

Ash Manor, Ash

The capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places. When I met the Head Teacher and Chairman of Governors they told me that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy, just three miles from their front door, and the possible negative effects on Ash Manor.

Connaught School

This is near Ash, just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

Hoe Valley Free School, Woking.

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications fromGuildford parents.

So there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. And In addition to those SCC has already approved expansions at the County School, Guildford and St Peters.

The birthrate in Guildford has fallen over the past two years. And whilst its too early to know if that trend will continue, it is another factor to urge caution, and not to proceed at this time.

The case for a new secondary school in Normandy is therefore not proven. If there is such a need elsewhere in Guildford Borough, I don't believe it is needed in the location proposed at Normandy.

TRANSPORT AND ROADS

In terms of transport, site 46 is located well beyond the existing confines of any urban area restricting the potential for sustainable travel. The existence of Wanborough Railway Station is only of a marginal benefit.

The area is bounded by the D60 (Glaziers Lane); the C16 (Wanborough Hill and Westwood Lane) and the A323 (Guildford/Aldershot Road).

I cannot envisage any so called "highways improvements" that could be undertaken, particularly on the C16 or D60 that would enable those roads to cope with the increased traffic from 1,100 homes and a Secondary School.

The A323 is already a busy major route, and scope for "improvements" to this road are also limited.
Although I suggest that in any case Highways should consider installing a passing lane, Guildford bound at the junction with Frog Grove Lane, Wood Street Village, to ease the congestion caused by commuter traffic turning right and causing considerable tailbacks. But that is a current, existing problem.

There would be access issues relating to visibility and safety for pedestrians and cyclists, which could be difficult to resolve given that the roads are fundamentally rural roads, and the existing structures of the Westwood Lane Railway bridge and the Glaziers Lane railway Road bridge. The restricted headroom of the Westwood Lane bridge would also prohibit double decker buses from accessing the proposed school.

**Rushmore Borough Council - Aldershot development**

Local Authorities have a duty to co-operate in making their local plans and I do not believe this has happened. In 2013 the development of 3,850 dwellings (population of approx. 9,000) in Aldershot was approved by Rushmoor Borough Council and is situated about 4 miles from Normandy. The development, over a 15 year period, includes two primary schools, and the provision of a SANG and many other provisions.

The first of these new houses, part of the first phase of 228 dwellings, are now on sale. The land belonged to the Ministry of Defence's former Aldershot Garrison known as Wellesley, Aldershot Urban Extension. Guildford BC responded to the plan in 2013 (ref: 13/P/00108) and in that said that GBC objected to the application on the grounds that insufficient information had been provided to allow a full assessment on the impact of that development on the highways network and said "the impact on Surrey's network and mitigation required has not been established" It its response to that planning application, Hampshire County Council, dealing with Highways and Transport issues, hardly referred to the A323. Copies of those responses are attached for reference.

**ENVIRONMENTAL CONSIDERATIONS**

A development of this scale, in such proximity to the Thames Basin Heath's Special Protection Area, should not be supported.

This is an environmentally sensitive location next to one of the component SSSIs of the Thames Basin Heath's Special Protection Area for birds. The Thames Basin Heath's mitigation plan seeks to zone development away from these sites. This results in a 400m buffer zone where no residential development is permitted.

A developer-led proposal driven by commercial considerations does not take account of the damage it would cause to the local environment and the strain it will place on the local infrastructure.

The Green Belt and Countryside Study referring to the importance of the openness of the land between Normandy and Flexford, has been ignored. The current version of the Plan treats Normandy and Flexford as separate settlements for the purposes of Green Belt ‘sensitivity’ but as one settlement for the purposes of ‘sustainability’. This is a double standard.

There are many vitally important ecological networks (green infrastructure corridors) that surround the proposed development area (namely Ancient and Semi-natural Woodland, Veteran Trees, Hedgerows, Semi-improved Grassland, Farmland and a Stream) and connect to other important and protected sites within Normandy Parish and the wider countryside (namely Wanborough and Normandy Woods Site of Nature Conservation Importance (SNCI), Normandy Pond SNCI, Normandy Common SNCI (put forward by the Surrey Local Nature Partnership in 2015), Wyke Churchyard SNCI, Little Flexford SNCI, and even more importantly Thames Basin Heath's Special Protection Area (TBH SPA)).

This proposed development would destroy a number of these habitats including Semi-natural Woodland, Veteran and Mature Trees, Hedgerows, Farmland and Semi-improved Grassland, plus would have indirect affects on Ancient Woodland habitat and the Stream through pollution (light, noise, litter and diffuse land and road runoff), predation and disturbance by increased number of cats and dogs (187 cats (cat ownership being 17/100 households) and 264 dogs (dog ownership being 24/100 households) and by people (potential fires and vandalism of trees).

The proposed SANG is only 10ha and will be on land that will be muddy in wet weather and during the winter. Whereas
the TBH SPA of Ash Ranges is dry during wet weather and during the winter, plus is either 5 minutes away by car or 20 minutes by foot.

All the habitats within or adjoining the proposed development site are Priority Habitats of Principal Importance under the NERC Act, plus a number of protected species (European Protected Species, Species of Principal Importance and those protected under The Wildlife and Countryside Act (1981) as amended) have been recorded within either the proposed development site or 500m to 1km of the proposed development site. These include Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beetles, Skylarks, Common Toads, Common Lizards, Grass Snakes, Adders, Slow worms, Badgers and Bats (including potential roosts within a number of veteran and mature oaks and other trees across the proposed development site and within the woodland blocks).

Light pollution from this proposed development on this scale would be starkly visible from Surrey Hills Area of Outstanding Natural Beauty (AONB).

Effect on surrounding woodland and stream habitats that adjoin these roads including the SNCI's of Normandy Common, Normandy Pond and Wyke Churchyard.

Potential adverse impacts on the SPA could result from noise and disturbance during construction and through usage of the playing fields when, in addition, external lighting could cause disturbance to the feeding and roosting patterns of the SPA bird species. There could also be impacts on hydrology affecting the open water and wet heathland of the SPA/SSSI and from increased traffic on Westwood Lane, Glaziers Lane and Guildford Road. Traffic pollution is a major source of nitrogen pollution that changes heathland into grassland and many journeys to a new Secondary School could be expected to be by car.

Prior to any allocation of the site it will be necessary for the borough council to be able to conclude, beyond reasonable doubt, that there would be no adverse impact on the integrity of the SPA as a consequence of the proposed development of the site.

Further work is needed by the borough council to provide the evidence needed to be able to reach that conclusion in respect of the use of the site as a secondary school. The site will require archaeological assessment in advance of any application for development being submitted. I am grateful to Danial Winchester a professional ecologist who lives in Flexford for much of the above information.

It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

**Surrey County Council, March 2013**

RESOLVED (unanimously):

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

1. The Coalition Agreement states:

   ‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.’

Council believes:
Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:

1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Further to my email of 29th June I wish to add further objections to the Draft Local Plan regarding Proposed Development Sites 46 and 47 (Normandy/Flexford), particularly regarding flooding and Sewage considerations.

Surrey County Council is the Lead Flood Authority for Surrey, and as such keeps records of all reports made to it of localised flooding problems. I attach a map showing the locations of reports in Normandy and Flexford, and you will see that there are a high concentration of flooding problems in the roads surrounding the proposed development site 46 and nearby to site 47.

Over several years, the Normandy Flood Forum has been coordinating action with not only SCC and GBC, but the Environment Agency, Thames Water and other agencies to alleviate these issues.

But the proposed building of over 1,100 additional new homes and a secondary school would overshadow all previous issues in terms of potential flooding risks.

Parts of Normandy, including the area next to the Hoe stream, have been and are subject to severe flooding problems, and the associated release of sewage into people’s properties and into the Hoe stream which would cut across the development.

The Wanborough Station Car Park is regularly flooded during the downpours which have been occurring regularly.

The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The area of proposed development at present allows natural drainage through the soil and trees; if this area is built on, the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area.

Whatever any proposed technical solutions there may be, local residents are very concerned that it will not be possible to cope with the increased amount of water and resulting flooding and sewerage.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- ME-254558_Wetspot information for Normandy and Flexford.pdf (5.4 MB)

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Comment ID: PSLPA16/4253  
Respondent: 10270913 / ECA (Martha Covell)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<documents attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 131015_SITELOCATIONPLAN.pdf (622 KB)  
- 151022EFF_D_A+GBAss.pdf (1.3 MB)  
- 120515Master.pdf (1.0 MB)  
- 160718_ECA_Reps.pdf (1.2 MB)

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Comment ID: PSLPP16/17364  
Respondent: 10270913 / ECA (Martha Covell)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1- Homes for all: Support with comments

We support the view that the Borough aims to ‘deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in the community.’ Policy H1 relies upon the Strategic Housing Market Assessment (SHMA) to inform any new development coming forward. The SHMA identifies a housing need of 693 dpa, previously set out.

This includes the allocation of the Wisley Aredrome site, which we have previously objected to as set out under policy S2.

Para 4.2.5 states that the Borough would “wish to see an appropriate mix of homes provided across the Borough, including the villages. Whilst all new development must be in keeping with the character of the surrounding area this does not preclude the delivery of smaller units as these are capable of being designed in such a way that respects the prevailing built form.”
The proposed Masterplan for the TREG consulting site in Effingham shows how the proposed development could include a range of dwelling types and sizes to meet a wide variety of housing needs, whilst maintaining adequate spacing between dwellings and be of a proportional size to the village to maintain the character and appearance.

The location of the TREG Consulting site, by comparison to the site north east of Effingham Village, is not in the conservation area or close to the boundary, and as a result will not have a detrimental effect upon the special and historic interest of the Effingham conservation area and listed buildings, or their setting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17365  **Respondent:** 10270913 / ECA (Martha Covell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

We object to Policy P2 which provides for new defined village boundaries, inset from the Green Belt, and major previously developed sites adjacent to a number of villages within the Green Belt. Whilst many of the Districts villages provide a sustainable location for future development, the new boundaries are based on an inadequate and unsound evidence base, namely the Green Belt and Countryside Study (GBCS).

The GBCS is unsound because:

- (1) It has failed to adequately assess sites and parcels in terms of the five purposes of the green belt and including land within it, as set out in the NPPF. Only sites which do not serve these purposes should be allocated for development;
- (2) The size of the parcels assessed are too large to enable proper detailed assessments of sites to be undertaken, taking into account important factors such as the need to define boundaries clearly, using physical features that are readily recognizable and likely to be permanent, in accordance with Paragraph 85 of the NPPF.

Policy P2 makes clear that many of the Borough’s villages will be inset from Green Belt if it is the view that they do not make a contribution to the openness of the Green Belt. Para. 4.3.13 states that Effingham will be inset from the Green Belt. The updated proposals map for Effingham (Page 338 of Appendix H) shows how the village boundary will be inset from the Green Belt and the relationship of this boundary to the Effingham Village conservation area.

We object to the amended Green Belt Boundary to Effingham Village on the grounds that it will lead to the merging of Effingham and Bookham and fails to give full consideration to the requirements of the NPPF in terms of the need to make full use of natural and man made features to create defensible green belt boundaries. The green belt boundary should be amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

Below is a more detailed analysis of why the proposed village boundary to Effingham is unsound contrary to paragraph 80 and 85 of the NPPF. Attached is our Green Belt Assessment of Effingham Village which examines the character of the Green Belt here in far more detail and should be taken into account in the consideration of amending the Green Belt boundaries here:
Land north east of Effingham Village

The area to the north-east of Effingham Village currently serves a number of green belt purposes in terms of preventing urban sprawl and keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt that serves all of these purposes. However, Land to the North East of Effingham Village currently serves a number of these purposes, more so than other parcels of land adjoining the village, which should be allocated instead. Details are set out below:

- **Purpose 1:** 'To check the unrestricted sprawl of large built-up areas: The parcel of land north-east of Effingham currently restricts the built up area of Effingham and Great Bookham and plays a vital role.
- **Purpose 2:** 'To prevent neighbouring towns merging into one another: This is the prime purpose of this piece of green belt as it prevents the villages of Bookham and Effingham from merging into each other. If this site was built upon then there would be a continuous development form one village to the other and the gateways between the two villages would completely disappear'.
- **Purpose 3:** To assist in safeguarding the countryside from encroachment. The allocation of this site for development would lead to significant development encroaching into the Countryside. Unlike our client’s site opposite on Effingham Common Road, there are no natural or man made barriers to the north to prevent the Countryside form further encroachment in the future. This allocation is therefore contrary to advice contained within Paragraph 85 of the NPPF which states that local authorities, should define boundaries which are clear and use physical features.
- **Purpose 4:** To preserve the setting and special character of historic towns; Effingham is an historic village and conservation area. However this site is not immediately adjacent to the historic core and development is unlikely to have a significant affect on the character of the village. Notwithstanding this, the sites have an open character and forms a gateway into the village which is currently green fields leading into an historic core will be severely eroded as a result of this allocation.
- **Purpose 5:** 'To assist in urban regeneration, by encouraging the recycling of derelict and other urban land' A very small part of the site contains some disused glass houses. However these are temporary structures and the land has an open and undeveloped character, with the exception of the school site. The site is therefore not in need of regeneration.

We trust you find these representations of use and we look forward to continuing our discussions with you in relation the potential site on Effingham Common Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
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<th>PSLPP16/17363</th>
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This policy identifies a need for 13,860 new homes within the plan period and proposes that this is provided at an increasing rate per annum starting at 500 dwellings per annum (dpa) in 2018/19 rising to 790 by 2032/33.

We support the provision of at least 500 DPA to meet the Boroughs Housing Needs. However, this development strategy relies on the allocation and development of Wisely Aerodrome, yet this is an isolated location and does not represent a sustainable form of development. The site is a designated SPA and nature conservation area. The open and linear character...
of the site, does not lend itself to development. The allocation of areas around villages is preferable as these are more sustainable locations for development.

In addition to this the allocation, of this site relies on unsound evidence base as we previously set out in our representations to the 2014 draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1956  Respondent: 10270913 / ECA (Martha Covell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A. This submission

Thank you for requesting our comments on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2016. We act on behalf of Top Real Estate Group (TREG Consulting) owners of a potential site off Effingham Common Road and wish the comments in this letter together with the following documents to be taken into consideration in taking this plan forward.

This submission comprises the following:
• Draft Masterplan
• Site Location Plan
• Draft Planning, Design and Access Statement
• A Green Belt Assessment of Effingham Village
• Phase 1 Sustainability Appraisal
• Phase 1 Ecology Assessment
• Transportation Appraisal
• Transport Accessibility report

B. Background

We have been developing proposals for a strategic site in Effingham on a long-term basis and have been a stakeholder in the emerging Guildford Local Plan and Effingham Village Neighbourhood Plan.

Our proposals for the site at Effingham are at an advanced stage and a pre-application enquiry was made in 2015. Details of these proposals are set out in our draft Planning, Design and Access statement.

C. Previous representations

Set out below is a summary of the representations we made to the emerging Local Plan in 2014 and evidence base:

• 1) Guildford Borough Council failed in their duty to co-operate because there is no evidence that they have taken our previous submissions, in particular our SHLAA submission, into account;
• 2) The evidence base is unsound because the methodology adopted for the Green Belt and Countryside Study (GBCS) is inconsistent between different sites and parcels of land and the GBCS and SHLAA conflates the distinctive roles of each;
• (3) The SHLAA is unsound because it has not made an objective and consistent appraisal of each site. Instead it has been informed by the GBCS. This is contrary to the NPPG, which confirms that sites with existing policy constraints should be included and previous constraints should not be accepted;

• (4) The GBCS is unsound because it fails to apply a significance test to the review of various land parcels; the parcels are too large; little weight is attached to the ‘5 purposes of the green belt’ contrary to paragraph 80 of the NPPF; there is an inconsistent analysis of settlements gateways and inconsistent approach to the creation of ‘new defensible green belt boundaries’;

• (5) The Borough Wide Strategy relies on the allocation and development of Wisely Aerodrome, yet this is an isolated location and does not represent a sustainable form of development. The site is a designated SPA and nature conservation area. The open and linear character of the site, does not lend itself to development. The allocation of areas around villages is preferable as these are more sustainable locations for development;

• (6) The Rural Exception Homes should be more flexible to accommodate ‘enabling development’ and alternative models of housing delivery, such as ‘community right to build’ and ‘community land trusts’;

• (7) Villages and Major Previously Developed Sites proposes new boundaries to settlements and the green belt, based on inadequate analysis in the GBCS which is unsound;

• (8) Green Belt and Countryside is based on an unsound and inadequate evidence base;

• (9) We object to the allocation of Wisley Aerodrome as it is based on an unsound evidence base;

• (10) We object to the identification of land north east of Effingham Village as a Potential Development Area (PDA) on the grounds that it is contrary to Paragraph 80 of the NPPF, as it serves a number of green belt purposes, contrary to Paragraph 85 of the NPPF as it fails to define a defensible green belt boundary, the development will have a detrimental impact on the character of the eastern and northern settlement gateways of Effingham’ and the scale of development does not relate proportionally to the scale of Effingham Village and does not represent a sustainable form of development.

D. The Emerging Guildford Local Plan 2016

The following policies of the emerging Local Plan 2016 are relevant to the consideration of the proposals at Upper Leewood Farm:

• Policy S2: Planning for the borough – our spatial development strategy

• Policy H1: Homes for all

• Policy H3: Rural exception homes

• Policy P2: Green Belt

• Policy P5: Thames Basin Heath Special Protection Area

• Policy D1: Making better places

• Policy D2: Sustainable design, construction and energy

• Policy D3: Historic Environment

• Policy D4: Development in urban areas and inset villages

• Policy I3: Sustainable transport for new developments

• Policy I4: Green and blue infrastructure

We specifically have concerns about the following policies:

• Policy S2: Planning for the borough – our spatial development strategy

• Policy H1: Homes for all

• Policy P2: Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a local resident at 19 Sime Close, Keens Lane, Worplesdon, Guildford I would like to add my voice and opinions to the new draft local plan please:

The SHMA is significant and should be reviewed to reflect the amount of housing built in Guildford over the last 5 years as opposed to an inflated number: by reducing the proposed 690 new builds to 250 this would reduce the need for the use of Green Belt as housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area</td>
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Keens Lane is currently in the Green Belt but the draft plan moves the urban boundary to exclude it from the green belt. I am extremely concerned about this for a number of practical reasons - not to mention the enormous impact it will have on the environment and the wellbeing of those who live here and enjoy the countryside and all its benefits..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The infrastructure in the area is unable to support a development on the site: Keens Lane is only 4.4m wide at the junction of Sime Close and Timbers (the 16th century property on the north side of the road). The roundabout at the eastern end of Keens Lane is dangerous because of traffic from Guildford treating it as a chicane. Worplesdon Road is currently one of the worst roads in the area for traffic congestion during rush hours. Any hardstanding from a development west of Findlay Drive will increase the already significant run off into Sime Close which floods the side of Syndey Court every time it rains, and consequentially silting up of the soakaway.

I understand Gravetts Lane was flooded on 23rd June after the rain the night before and the sewers were bubbling up with the need for a major clean up to be carried out. There is insufficient infrastructure and power which would require a huge upgrade for both gas and electricity in the area. Additionally core services such as Schools, Drs, Hospitals etc - already desperately overstretched - would need to be majorly invested in.

I hope my concerns may be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/467  Respondent: 10281569 / Alison Sutherland  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10525  Respondent: 10299041 / F McHugh  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10563  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10569  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10515  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/10518  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10521  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10575  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10556  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10545  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10549  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of...
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10572  Respondent: 10299041 / F McHugh  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the...
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in
road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise,
pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of
the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant
Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to
build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for
enhanced infrastructure as would a more realistic housing number.

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build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for
enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion -
averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get
worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road
network has not been given sufficient consideration. Some proposed development locations would require highway
schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried
away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and
unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure
capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside
the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based
on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-
viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns
over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if
at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been
identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing
residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.
No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical
Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing
health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will
stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10507 Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/10500</th>
<th>Respondent: 10299041 / F McHugh</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10503  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Employment

In 2016 Enterprise M3 LEP commissioned Regeneris to undertake a review of their 2013 Commercial Property Market Study. The final report is due to be considered at Enterprise M3’s Board Meeting in July 2016. Information relating to this is not yet in the public domain but for the purposes of this consultation has been referenced to help support our response. In light of this, Enterprise M3 requests that this response is only made public once the Commercial Property Market Study has been published.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Its highly skilled labour, market and transport connections to London mean that office development attracts some of the highest rental values in the LEP area and that speculative office development is therefore commercially viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment.

The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand. Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains a persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.

Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of land for industrial and storage & distribution uses can also be accommodated at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage & distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.
On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns. As mentioned above we would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support the continued growth and prosperity of the town centre going forward. We are very supportive of the increased housing target and would very much welcome the opportunity to work with you to ensure its delivery and to continue to work with you in the positive way which we have done to date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14854   Respondent:  10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough’s largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complimentary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14855   Respondent:  10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport
The Local Plan rightly highlights the pivotal role the provision of transport infrastructure will have to play in the successful delivery of the policies contained within it. Transport issues act as a major constraint, holding back Guildford’s ability to maintain and build its existing economy, which in turn can deter further investment. In particular excessive congestion and poor accessibility to the town centre and key employment sites such as the Surrey Research Park act as a constraint on growth. The Local Plan represents a key opportunity to formulate a coherent plan to ensure that growth can be delivered and sustained across Guildford. It needs to be flexible enough to enable the strategically focused programmes developed by key stakeholders such as the LEP, Surrey County Council, Highways England, Network Rail and the University of Surrey to create accessibility and infrastructure improvements, which will unlock development opportunities, increase housing supply and improve the capacity of Guildford to generate wealth and high quality jobs. Enterprise M3 therefore welcomes the Strategic Objective 12 to facilitate the timely provision of necessary infrastructure to support sustainable development, together with the commitment given through Policy I1 towards the delivery of infrastructure. This commitment demonstrates the importance of working with partners to ensure a programme of infrastructure provision for the Borough is delivered both within and beyond the Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14859  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Similarly we welcome Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”. We note in particular that it is considered that the delivery of some housing targets is dependent upon major improvement to the A3 through Guildford. Enterprise M3 LEP will continue to work closely with partners and continue to put pressure on Government to deliver the infrastructure that is needed to unlock and support the development of key housing sites and would expect Guildford Borough to play an active role in this engagement with government. Enterprise M3 welcomes the strong emphasis throughout the plan on the benefits of investment in sustainable transport and the recognition that such investment can contribute significantly to economic growth. We are therefore supportive of Policy I3 related to sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10268  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Thank you for the opportunity to make representations on this latest version of your Local Plan. This submission follows on from the previous consultation responses we have made, particularly those relating to the Guildford Town Centre Masterplan, 2015. Enterprise M3 is the Local Enterprise Partnership covering the Guildford Borough area as well as other local authority areas in West Surrey along the M3 Corridor into Hampshire. Its remit is to support and sustain economic growth at a local level and Enterprise M3 set out its vision, key priorities and actions in its Strategic Economic Plan, which was published in March 2014. The vision for the area is to be: ‘...the premier in the country for enterprise and economic growth, balanced with an excellent environment and quality of life.’ The Strategic Economic Plan recognises the importance of Guildford, identifying it as one of only four major ‘Growth Towns’ in the Enterprise M3 area, whose continued economic performance is critical to the local and wider economy. Enterprise M3 has worked closely with Guildford Borough Council throughout the development of the emerging Local Plan, both on the development of the Plan and its evidence base and how the Local Growth Fund can be used to support growth across the Borough.

Enterprise M3 welcomes the overall vision set out in The Proposed Submission Local Plan and is committed to working with Guildford Borough Council and partners to achieve its vision during the plan period. Whilst our consultation response highlights key aspects that we feel require further consideration, we are on the whole content with the strategy set out within the document for delivering growth within Guildford up until 2033. Guildford Borough Council has worked closely with Enterprise M3 since the LEP’s inception in 2011 and is one of our key Growth Towns, as set out in our Strategic Economic Plan, 2014. Enterprise M3 wishes to continue to work collaboratively with partners at Guildford Borough Council as the Local Plan process continues and once adopted to facilitate its delivery.

New Homes

The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford’s draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015. Whilst we are supportive of this policy, we note that the table showing Guildford’s Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.

Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town. Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period.

Enterprise M3 notes that within Guildford Borough Council’s Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply increases to 2.5 years, however the AMR recognises that this addition is not certain. Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford’s Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites. Housing affordability is a key issue across the Enterprise M3 LEP area, particularly in Guildford. The Proposed Submission Local Plan highlights that the affordability ratio in Guildford was 10.92 in 2013, higher than Surrey’s ratio of 10.89 and much greater than England’s ratio of 6.451. Guildford was also highlighted in Enterprise M3’s Housing Evidence Study, 2014 as the second most
expensive district for people wishing to buy market housing. Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five of more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of paragraph 4.2.40 of the Plan which makes reference to the Council following a cascade mechanism to assist in the delivery of housing schemes should viability become an issue during the development process. Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference in section 4.2.12 to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2244  Respondent: 10305921 / Enterprise M3 Local Enterprise Partner (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In 2016 Enterprise M3 LEP commissioned Regeneris to undertake a review of their 2013 Commercial Property Market Study. The final report is due to be considered at Enterprise M3’s Board Meeting in July 2016. Information relating to this is not yet in the public domain but for the purposes of this consultation has been referenced to help support our response. In light of this, Enterprise M3 requests that this response is only made public once the Commercial Property Market Study has been published.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Its highly skilled labour, market and transport connections to London mean that office development attracts some of the highest rental values in the LEP area and that speculative office development is therefore commercially viable. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment.

The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand.

Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to
prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.

Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough’s largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complimentary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains a persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.

Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of land for industrial and storage & distribution uses can also be accommodated at Garlick's Arch, Send Marsh/Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage & distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns. As mentioned above we would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support the continued growth and prosperity of the town centre going forward. We are very supportive of the increased housing target and would very much welcome the opportunity to work with you to ensure its delivery and to continue to work with you in the positive way which we have done to date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/2243 | Respondent: | 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack) |
| Agent: | |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy E4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

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The Commercial Property Market Study, 2016 highlights that the challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under growing pressure to be converted to residential uses. It therefore follows that Enterprise M3 is therefore very supportive of employment allocations for quality, grade A office space within Guildford town centre which meets this demand.

Although within the Proposed Submission Local Plan we have noted that there are a limited number of allocations for employment development within the town centre, Enterprise M3 is supportive of the Draft Guildford Town Centre Masterplan, 2015 and look forward to seeing the proposals and working with Guildford Borough Council to bring it forward. In particular, the ability of the Bedford Wharf area to provide much needed employment space within the town centre would be very much welcomed.

Nevertheless, given the recognised shortage of office space within the town centre we encourage further consideration to be given to ensuring that there is sufficient land allocated for quality office development within the town centre in order to prevent the loss of existing and new major users in the future finding no suitable land in Guildford and subsequently locating elsewhere to the economic detriment of the wider Enterprise M3 area.
Enterprise M3 is very supportive of policy E4, which makes provision for a 10 ha extension to Surrey Research Park. This is one of the Borough’s largest employment areas and a centre of excellence in technology, science health and engineering. This extension is expected to provide up to 35,000 sq m of additional office and R&D floor space, which added to the remaining 9,000 sq m provides a significant amount of employment space for research, development and design activities that are complimentary to those activities undertaken at the University of Surrey. This extension will ensure the continued growth and success of the Research Park and the businesses within it, which aligns strongly within our ambitions for innovation and enterprise across the Enterprise M3 LEP area, particularly around the development of 5G technology for which the University of Surrey is playing a key part.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. Since 2013 the business park has achieved one pre-let and is also speculatively building out two units, with only 6,000 sq m of development space remaining.

However, the Commercial Property Market Study, 2016 recognises that there remains persistent shortage of both available industrial space and land with development potential in most market areas within the LEP. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing which could attract new investment to the LEP area in light of recent upwards trends in e-commerce. This undersupply of B8 space transcends LEP boundaries, with very strong demand evident for any sites that can serve the London market. We would therefore encourage further consideration to be given in planning for storage & distribution employment space to meet the needs of the warehousing/logistics sector in the South East, a region which has been recognised as experiencing a particular shortage.

Policy E1 makes reference to the need to plan for between 4.7ha and 5.3ha of industrial land (B1c, B2, and B8 uses) within Guildford during the plan period 2013 - 2033. From looking through the Site Allocations section of the Proposed Submission Local Plan, the majority of this requirement for industrial land can be met through the development of the Slyfield Regeneration Area (Allocation A24), a 40 ha site allocated for light industrial uses as well as 1,000 homes, 4 traveller pitches, a new waste management depot and sewage treatment works and community facilities. A further 7,000 sq m of land for industrial and storage & distribution uses can also be accommodated at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Allocation A43) and as aforementioned, 6,000 sq m of development space for storage & distribution uses also remains at Henley Business Park. This indicates that there is enough supply to meet the requirements for industrial development as set out in Guildford’s Employment Lands Needs Assessment, 2015 and we are supportive of this approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3244  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport
The Local Plan rightly highlights the pivotal role the provision of transport infrastructure will have to play in the successful delivery of the policies contained within it. Transport issues act as a major constraint, holding back Guildford’s ability to maintain and build its existing economy, which in turn can deter further investment. In particular excessive congestion and poor accessibility to the town centre and key employment sites such as the Surrey Research Park act as a constraint on growth. The Local Plan represents a key opportunity to formulate a coherent plan to ensure that growth can be delivered
and sustained across Guildford. It needs to be flexible enough to enable the strategically focused programmes developed by key stakeholders such as the LEP, Surrey County Council, Highways England, Network Rail and the University of Surrey to create accessibility and infrastructure improvements, which will unlock development opportunities, increase housing supply and improve the capacity of Guildford to generate wealth and high quality jobs.

Enterprise M3 therefore welcomes the Strategic Objective 12 to facilitate the timely provision of necessary infrastructure to support sustainable development, together with the commitment given through Policy I1 towards the delivery of infrastructure. This commitment demonstrates the importance of working with partners to ensure a programme of infrastructure provision for the Borough is delivered both within and beyond the Plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Similarly we welcome Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”. We note in particular that it is considered that the delivery of some housing targets is dependent upon major improvement to the A3 through Guildford. Enterprise M3 LEP will continue to work closely with partners and continue to put pressure on Government to deliver the infrastructure that is needed to unlock and support the development of key housing sites and would expect Guildford Borough to play an active role in this engagement with government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Enterprise M3 welcomes the strong emphasis throughout the plan on the benefits of investment in sustainable transport and the recognition that such investment can contribute significantly to economic growth. We are therefore supportive of Policy I3 related to sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2241  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Homes

The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford’s draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015.

Whilst we are supportive of this policy, we note that the table showing Guildford’s Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.

Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town. Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period.

Enterprise M3 notes that within Guildford Borough Council’s Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply increases to 2.5 years, however the AMR recognises that this addition is not certain.

Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford’s Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites.

Housing affordability is a key issue across the Enterprise M3 LEP area, particularly in Guildford. The Proposed Submission Local Plan highlights that the affordability ratio in Guildford was 10.92 in 2013, higher than Surrey’s ratio of 10.89 and much greater than England’s ratio of 6.451. Guildford was also highlighted in Enterprise M3’s Housing Evidence Study, 2014 as the second most expensive district for people wishing to buy market housing.
Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five of more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of paragraph 4.2.40 of the Plan which makes reference to the Council following a cascade mechanism to assist in the delivery of housing schemes should viability become an issue during the development process.

Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference in section 4.2.12 to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2242  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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[One or more sections of this comment have been removed because they did not relate to a change to the plan.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6910  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are no exceptional circumstances to justify this blatant assault on the green belt.

To maintain that the site is actually brownfield and not green belt, constitutes a mis-representation.

If allowed, this proposal would devastate the village of Ockham and nearby villages of Ripley and the Horsleys.

There is absolutely no precedent to destroy the existing tract of quality farmland in the green belt.

Agricultural land is very important; priorities and the food supply may change in the years ahead.

The land forms an important barrier between Cobham and Ockham & Ripley and an inevitable inexorable sprawl of urbanisation would inevitably follow if this appalling idea were to see the light of day.

The proposal is not sustainable, there is insufficient land available.

The site is adjacent to an area of outstanding natural beauty (AONB).

The road network is inadequate, not to mention loss of good farmland and natural habitat.

I strongly object to the the proposed green belt developments at Wisley Airfield, West Horsley, East Horsley, Send, Send Marsh, Garlic Arch (A43).

The consequences for these villages would be profound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6912  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of these sites.

This constitutes serious level of over-development of these villages, particularly Wet Horsely which has retained its open connection with the green belt.

The construction of 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough; it would destroy the rural character of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6911  Respondent: 10326081 / Ian Wilkinson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This would profoundly alter the character of this sensitive area.

Ripley sits in a traffic junction lying between these six villages/locations; the traffic volumes created by these developments would dominate and ruin normal village life for all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6913  Respondent: 10326081 / Ian Wilkinson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Planning Policy for Traveller Sites (2012) guidance states:

Policy E: Traveller sites in Green Belt

"14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development."

There are no such very special circumstances to justify the inclusion of this policy.

2003 Local Plan - Policy HE10: Development Which Affects The Setting Of A Conservation Area

"The Borough Council will not grant permission for development which would harm the setting of conservation area, or views into or out of that area.

11.31 Planning authorities are required to ensure that developments within conservation areas preserve or enhance the character or appearance of that area. The desirability of preserving or enhancing an area should also be a material consideration in the determination of proposals which are outside the conservation area but would affect its setting, or views into or out of the area."

The site directly abuts Ripley Conservation area. This development does not preserve the conservation area, nor is it an enhancement; the setting of the conservation area is therefore compromised.

Policy D3 supports this view.

The occupants were granted temporary consent for 3 years in 2015 by the Appeal inspector, with full provision for the restoration of the site to its original condition at the end of the period of temporary consent.

Local residents are appalled at the inclusion of this attempt to formalise traveller occupancy in this sensitive green belt location; this is property development by stealth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15101  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

"We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated."

"4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development."

"in order to facilitate the development that is needed “ – hardly an adequate justification for ripping up hundreds of acres of green belt, this is vague, very brief and does not constitute a valid explanation or a reason.
This draft plan proposes a set of developments across the borough which, if implemented, would devastate the Metropolitan Green Belt.

The Council's housing proposals in the green belt would constitute inappropriate development.

NPPF states:

87. "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development in the green belt therefore requires there to be 'exceptional circumstances in each case to justify the harm done to the openness of the green belt.'"

No such circumstances have been demonstrated in this draft local plan. The then Undersecretary of State for Planning, Nick Boles has written letters in March and June this year warning that it is unlikely that 'unmet housing need' will constitute the 'exceptional circumstances' required to allow development in the green belt.

The green belt does not exist purely to be exploited by developers as building land.

This policy states, “the general extent of the Green Belt has been retained.” Hardly true.

1.6% of the Borough’s Green Belt is stated would be lost: taking into account the infilling and settlement boundary extensions, 7% is a more accurate figure - far too high.

NPPF: Section 9 - The opening paragraph (79) states:

"79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

The word permanently and permanence are used and from this, one might assume that the green belt and its boundaries will be permanently maintained.

The Metropolitan green belt was established to be a permanent barrier to future urban sprawl. To allow a series of incremental advances of land available for housing development every ten years is going to rapidly and permanently change and degrade the character of this borough.

The open character of the green belt, that very crucial parameter which the NPPF seeks to preserve in section 9, will, incrementally, be destroyed.

This Council should view the green belt as a major asset, to be preserved at all costs, for the enjoyment of future generations, and not condemn them to a life of suburban misery for the sake of short term economic gain.

This natural asset is valuable beyond compare and the short term political needs of a Borough Council should not be allowed to impinge on the long term aims and purposes of the established Metropolitan green Belt.

Appropriate development in the Green Belt can be achieved through a balanced, even distribution of a realistic and sensible level of new house building throughout the Borough, across the villages and proportional to the existing populations with appropriate infilling; in this way, infrastructures are less stressed and there would be less disruption to the character of an individual settlement.

This approach would also be more democratic; the burden is shared evenly and most people will accept that approach.
Insetting of villages:

OBJECT.

The Green Belt and Countryside Study attempts to identify in a very crude way those villages which will be suitable for insetting.

The so called proposed insetting or removal of a village from the green belt would be a serious retrograde step. The term appears to have been introduced in the 2012 NPPF document which is now effectively the planner's bible.

Pegasus, in their Green Belt & Countryside Study Vol IV, have determined that Ripley village should be inset.

Pegasus appear to have adopted a method of interpretation of NPPF paragraph 86 which considers a village's open character and its susceptibility for insetting. Here they seek to 'measure' the importance of the contribution which the village's open character makes to the openness of the green belt. This is an attempt to convert the requirements of a loosely worded paragraph, written by a legally trained person into a precision scientific measurement; this in itself is a challenge because the very nature of a village's open character does not readily lend itself to this form of measurement.

The very form of words in NPPF paragraph 86 was probably chosen because it would be nearly impossible to measure the parameter 'importance of a contribution made by a village's open character', and thus the paragraph could be exploited in either direction by parties with different agendas, ie developers and those against it.

In the 'Stage 3', we have the 'professional judgements' and the responses on the village insetting criteria, (which are again arbitrary), for Ripley:

"Does the majority of the village exhibit an open character? - Response: "On balance, the majority of the village is considered to exhibit an enclosed character"!

"Do open areas within the village appear continuous with surrounding open land beyond the village? - response starts by saying "visual connections to the wider green belt are partially enclosed by woodland"! In reality, virtually all the open areas are continuous with open land or wooded land.

1. a) The questions are farcical.
2. b) The answers to the arbitrary questions are incorrect!

Furthermore, the 'openness of a village' is, of course three-dimensional and the idea that two-dimensional mapping aerial photography and computer analysis in that domain can somehow replace the three-dimensional world is flawed.

Pegasus have effectively 'engineered' this measured solution to their brief, which I would guess was: - 'produce a report which will support the insetting of most of the rural villages in the borough'.

On the 3 Pegasus maps the entire north side bounded by the High Street and Newark Lane is the village green - completely open land. The area to the east - bounded by the High Street and Rose Lane, although increasingly dense towards Rose Lane still has connection to significant open land to the East, including school playing fields. The southern quadrant of the village - bounded by Rose Lane and the Portsmouth Road really is mainly either farmland, open land or graveyard land. The remaining quadrant, to the West - land bounded by the Portsmouth Road and Newark Lane is the dense conurbation of the Georgelands estate and Wentworth Close etc, including the Primary School and playing fields; this quadrant of the village of course cannot be regarded as open, but its North and West boundaries are directly connected to farmland.

If the combined Georgelands and associated estate were to be distributed throughout the whole village, there would clearly be impairment to the village's open character, but, the fact that the estate is effectively 'condensed' into the compact quadrant has the effect of relieving the majority of the village from an impact on its open character.

The 'perceived village area' is also a totally arbitrary boundary line that has no real logic, and could be drawn virtually anywhere.
Referring to NPPF paragraph 86 again, Pegasus effectively assert that Ripley does not need the protection to its open character provided by being washed over by the green belt; the open character is not likely to be subject to damage by development - really?

Yes, the more vulnerable parts of the village have the protection offered by Conservation Area planning policy, but, we have just seen that hurdle neatly demolished by the recent White Hart Court development - charmingly now named Marlborough Place. Set in the midst of a Heritage Asset, and numerous listed buildings, this hideous, dense, part three-story estate changes the character of Ripley for ever - yes the open character has been impaired.

The open character of Ripley is the essence of the village. This is true of other similar villages nearby.

On entering the village from the North East, within 50 yards on the right is the village green - a large area of open land fully accessed by all; this long strip of land 'the Green', defines the village. Beyond the Green, is farmland and meadows and flood plain toward The Wey. In fact from the High Street and Portsmouth Road which run through the heart of the village, at pretty much any point, you are within 50 or certainly 100 yards of either open land, farmland, other wooded green land, hedgerows or other 'greenness'.

To argue that the open character of the green belt here in Ripley will not be damaged by development (para 86), is extremely dubious and any visitor to the village would surely recognise this.

Insetting would be a retrograde step for all the borough's villages for the reasons outlined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15099  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this broad policy, any development will be classed as “sustainable”, totally ignoring the NPPFs guidance on the fundamental need to preserve the green belt boundaries.

The Green Belt forms 89% of the borough and really should be established as one of the primary aims of the policy. Most of the land area is green belt and there needs to be a reference to how the Council intends to implement planning policy in this highly relevant context. Policy S1 needs to state that it will maintain and protect the existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15100  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the proposal to build 13,860 new homes:
This number is postulated in advance of the recent UK Referendum which now sets the course for a substantial revision of estimates for economic and population growth, including migration. A substantial downward revision will be necessary.

The number of 13,860 new homes remains unsubstantiated. The SHMA has not been scrutinised by Councillors despite repeated requests for debate, nor has there been any public consultation.

Other experts in this field of demography have not been able to reproduce this value or even close.

The Guildford Society concluded in 2014: "The premise for the housing data in the Draft SHMA published by GL Hearn looks deeply flawed and a full demographic analysis needs to be undertaken to understand the need for housing in Guildford during the Local Plan period."

The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need.

The notion that economic growth is somehow enhanced by building houses is flawed; there would be short term boost and vast profits for the developers, their associates and banks, but the real outcome is to increase the level of personal debt, and with the house price/income ratio now approaching pre 2008 levels, in the South East, economic instability will result, particularly following an economic shock, such as interest rate rises or a recession.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account nor the fact that 1000’s more visitors appear for special events several times a year and the resultant traffic has not been taken into account.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I think it is safe to say that given the staggering lack of foresight that has gone into the creation of the new local plan its authors have not read the National Planning Policy Framework, or have simply chosen to ignore its contents. May I therefore remind the planning department of GBC (in addition to its collective duty to uphold electoral promises to protect the Green Belt) that a key tenet within it is: “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

I object to the removal of Send from the Green Belt on the grounds that Green Belts should be kept open and permanent. To remove Send from the Green Belt would be shockingly myopic and would deprive future generations of their right to a Green Belt that is open and permanent.

Also from the National Planning Policy Framework: “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

I object to the removal of Send from the Green Belt on the grounds that once established, Green Belt boundaries should only be altered in exceptional circumstances. There are categorically no proven, justified, or exceptional circumstances to do so.

Also from the National Planning Policy Framework: “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

I object to the removal of Send from the Green Belt and the proposed development of over 400 houses which is inappropriate, disproportionate and harmful to the Green Belt. Seeking to inset the village does not resolve the problem; it just exacerbates the harm.

I could go on of course but I think GBC’s proven scattergun approach to town planning, flagrant disregard for previous promises and a blinkered approach to Local Plan development means the views of 1000’s of local residents are unlikely to be heeded or properly considered in a fair and reasonable manner. However, I’m an optimist so remain hopeful that the words of the author Bill Bryson in ‘The Road to Little Dribbling’ may generate a flicker of reasonableness, common sense and foresightedness from the disfunctioning pool of incompetence that is the GBC Planning Department. I doubt it but shall include the quote anyway: “there isn’t a landscape in the world that is more artfully worked, more lovely to behold, more comfortable to be in, than the countryside of Great Britain. It is the world’s largest park, it is the most perfect accidental garden. I think it may be the British nation’s most glorious achievement.”

I object to the GBC planning department ‘insetting’ Send from the Green Belt and in so doing permanently destroying the character of the village and by proxy the beautiful surrounding countryside.

I hope that your individual legacies will not be the indelible destruction of another small part of British countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In summary I again object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

- It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
- It is further from railway stations than any other identified strategic site.
- It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junction in the country (J10).
- Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
- Any public transport provision such as bus services to/from Guildford or into Effingham, East Horsley or either of the nearby stations will have to negotiate the over-crowded SRN, will be an unreliable service for potential customers but more important dangerous on such small narrow over crowded lanes. Furthermore there is insufficient parking available at East Horsley or Effingham to accommodate the additional population that will need to commute either to London or into Guildford using the rail service.
- Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe. This infrastructure is simply not there to support this.
- It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 annum.
  - The associated traffic increase from the RHS has not been taken into account.
  - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
- Whenever there is an event on today, the traffic is at a standstill already.
- There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
- The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station, Effingham or East Horsley.
- It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
- The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
- Opportunity (3) should be common to all sites and is not unique to this site.
- I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.
- I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
- I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
I object to the removal of additional 3.1 ha from the green belt without any justification. Green belt is supposed to be PROTECTED!

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact and is PROTECTED green belt land!

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge. Junction 10 of the M25 / A3 is already above the legal air quality limits. As I have 2 asthma suffers in my household this is extremely important to us particularly as a family.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above, yet again, this plan is unsound and not fit for purpose. I object to this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.
6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1174  Respondent: 10423265 / Jillian Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2296  Respondent: 10423265 / Jillian Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/2299  **Respondent:** 10423265 / Jillian Tallick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2297  **Respondent:** 10423265 / Jillian Tallick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2292  **Respondent:** 10423265 / Jillian Tallick  **Agent:**
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

2. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

4. **I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2295  Respondent: 10423265 / Jillian Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3198  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of any evidence for the alleged housing need numbers. Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. No reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3199  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix II: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41: • Amount of new housing far exceeds local need. • Housing density excessive when compared with existing development. • Would transform the Horsleys into a sizable town, something for which no case is made. • No local support. • Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites. • Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt. • Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. • No account taken of additional impact of Wisley Airfield site on Horsleys. • Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6334  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
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<td>I OBJECT TO</td>
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<td>I OBJECT TO</td>
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<th>Comment ID:</th>
<th>PSLPS16/6331</th>
<th>Respondent: 10430401 / St John the Evangelist (Mark Woodward)</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO</td>
<td>the late inclusion of site A43 Garlicks Arch. There has not been any consultation on its inclusion and the impact to the surrounding area.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I OBJECT TO site A43a the on and off ramp at Burnt Common/Clandon – this will increase traffic problems, not help them! There will be a catastrophic increase in traffic resulting from spreading new housing estates across the area. Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6336  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO site A57 The Paddocks – 4 traveller pitches. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13177  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P2 – Green Belt. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13175  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the local plan as the development proposed is not sustainable. (POLICY S1) • No guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy and no commitment to protecting it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/288  Respondent: 10436353 / Oscar Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Clandon Road, Burnt Common i find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportianate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/221  Respondent: 10438209 / Anna Beagles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objections to the 2016 local draft plan.

I strongly object to any erosion of the green belt.

I live in Send GU23 & with regard to the local proposed building plans: I strongly object to the number of houses which are proposed for, we do not have the infrastructure in our village to sustain all the additional residents & traffic. Do not destroy our green belt, our beautiful countryside. Do not overload/over stretch our village with extra people & cars, we already have difficulties getting school places & doctors appointments.

In addition for these local plans I highly object to the limited consultation period given.

Please re consider - there must be other "brown" sites which could be built on which have the added infrastructure of being within larger towns ?

Thank you for your consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7392  Respondent: 10441057 / Guy Kelly  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a lot of wildlife in the area, my Mum’s home is directly opposite site A22 where there is an abundance of wildlife, even stag beetles which are endangered and protected. Frogs, birds, foxes, all sorts of things will be lost if the 140 planned homes and a care home are built on it.

I disagree with the proposal of many traveller pitches in Guildford, [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

The land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home I believe is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained and not built on. I am appending at the end of this email* the agreed Policy of Surrey County Council for your reference and urge that the green belt be protected by Guildford Borough Council.

2. Keens Lane is a narrow road (the word "lane" is a clue) and building more homes there would entail the widening of the road, but this does not account for the fact that at the far end, near to Gravetts Lane/Tangle Lane, it is constricted and the area is already congested. Since the new housing has been built the traffic in the lane is uncontrolled and many cars speed along it. There are often near collisions on the brow of the hill on the lane as traffic speeds faster and faster and I fear for my sister who often rides her horse along it and encounters drivers who have no consideration for welfare of her or her horse and don’t slow down.

3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object most strongly to the proposals to build on Guildford’s greenbelt land. Past Governments made the policy of greenbelt to protect it for the country, the people and the wildlife and for new Governments to erase these policies makes the making of any policy a farce if, in time, it can be overwritten.

Building new homes is treating the symptoms of over population. All it will bring about is more population and more housing needs. The causes need to be treated, the Government and local authorities should be addressing the causes of over population, not eternally accommodating it. The infrastructure of Guildford cannot take any more population. The Aldershot road is always heavily congested in the morning and evening, the A322 around the Brookwood area is regularly congested and more housing in Guildford would add to this problem, the same for Burpham, Jacobs Well etc. Concreting over the land creates more flooding, with all the rain this summer the flooding is more than evident.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16461  Respondent: 10441057 / Guy Kelly  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

* It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

Surrey County Council, March 2013
RESOLVED (unanimously):

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

2. The Coalition Agreement states:

‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.’

Council believes:

Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:

1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents
I object to the Policy A43 at Garlicks Arch because it ignores the thousands of previous objections and this is Green Belt and Ancient Woodland. No Exceptional Circumstances exist here for ignoring Green Belt. There is no justification for Travelling Showpeople plots - why are these required? It is overdevelopment of the area and the number of homes planned is excessive. The land is prone to flooding and is also contaminated with lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I also object to Policy A58 at Burnt Common because although it was taken out of the 2014 Draft plan it has now reappeared with Maximum now replacing the word Minimum. There is no need for commercial, industrial and warehouse development in the middle of the Green belt when Slyfield still has many empty sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The removal of the Green Belt from Send Business Park leaves it open to further expansion which would cause severe problems along the small country roads leading to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The 140 residencies and care home development on Keens Lane will impact again on the greenbelt, the area is already choked with traffic and choked with pollution. Keen lane is a single lane road how on earth will it cope with additional traffic. The development is very close to Whitmore common and would impact on the sensitive ecology of the area. The proposed development is sited on a vital wildlife corridor between Whitmoor and broad street common, such corridors being a matter of major government concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Our local village of Fairlands is open to development. We need protection from inappropriate local planning. Garden grabbing stipulated by the government should not form part of the local plan but this is exactly what could happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7138  **Respondent:** 10443489 / Vincent Withams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the number of homes (14,000) that are been proposed, 690 per year till the end of the plan. This is unsustainable, the area will not cope with the additional infrastructure needed and increased traffic. It will encroach on to our greenbelt, a natural corridor for wildlife. Studies have already shown that the already existing traffic congestion cannot been solved so why on earth add more. Just think of the pollution that will affect the health of the local residents as stationary cars bellow out continuous fumes day after day. We need our greenbelt, Guildford needs it’s greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/903  **Respondent:** 10446337 / Rosie Porter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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Having read a leaflet from award winning property developers Dandara, I agree that the Council should consider smaller more proportionate development on lower quality Green Belt sites, rather than large-scale growth on some of the most sensitive Green Belt and countryside in the Borough.

For example their land adjacent to the A246, near West Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pssl172/279  Respondent: 10446721 / John Selves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/84  Respondent: 10447777 / J Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to developments in Send rushed through into the draft local plan.

I object to the 400 houses and 7000 square metres of industrial and warehousing proposed for the GREEN BELT land at Garlick’s Arch. Where is the sound evidence that further housing and industrial space is needed in Send? The Government promised protection of the Green Belt. How is it that GBC can just override this? **Once you start building on Green Belt there is no stopping and no going back.** And for what purpose? **There are no exceptional circumstances** to build this large number of houses plus industrial space on Green Belt land. Where are all these people? Martin Grant has slipped
in 6 new homes recently and more houses are planned near Vision Engineering. There is already industrial space in Tannery Lane plus the Marina and warehousing at Burnt Common (where there was to be housing – now cancelled). 400 houses will bring another 800 cars on to the roads plus an indeterminate number of children with insufficient school places. Doctors’ surgery would be overwhelmed.

I object to the proposed junction on the A3 at Burnt Common. More Green Belt land lost there. I live in Send Barns Lane and every morning and evening the road is at a standstill. Send is a village and cars can be parked on the road and people need to cross the road at various places. The heavy traffic coming through it to get onto the A3 at Burnt Common would absolutely destroy Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/171  Respondent: 10447777 / J Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to developments in Send rushed through into the draft Local Plan.

I object to the fact that GBC has not followed the correct process in connection with the changes made since 2014. The new proposed road junction and the number of houses require a full consultation under Regulation 18 - not the short cut of Regulation 19.

I object to 400 houses and 7000 square metres of industrial and warehousing proposed for the GREEN BELT land at Garlick's Arch. Where is the sound evidence that further housing and industrial space is needed in Send? The Government promised protection of the green belt. How is it that GBC can just override this? Once you start building on Green Belt land there is no stopping and no going back. And for what purpose? There are no exceptional circumstances to build this large number of houses plus industrial space on Green Belt land. Where are all these people? Martin Grant has slipped in 6 new homes recently and more houses are planned near Vision Engineering. There is already industrial space in Tannery Lane plus the Marina and warehousing near Burnt Common (where there was to be housing - now cancelled). 400 houses will bring another 800 cars on to the roads plus an indeterminate number of children with insufficient school places. Doctors’ surgery would be overwhelmed.

I object to the proposed junction on the A3 at Burnt Common. More Green Belt land lost then. I live in Send Barns Lane and every morning and evening the road is at a standstill. Send is a village and cars can be parked on the road and people need to cross the road at various places. The heavy traffic coming through it to get onto the A3 at Burnt Common would absolutely destroy Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3038  Respondent: 10447777 / J Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000 sq metres of industrial space at Garlick’s Arch by Send Marsh Road. Again, Green Belt land and ancient woodlands. Another 800 cars if not more would add to the already jammed local roads. Industrial space is not needed in this area. There is already industrial space where houses were originally planned. Slyfield is the area for industry

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/3039  Respondent: 10447777 / J Jordan  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common. Send Road and Send Barns Lane are at a standstill every morning and more traffic will make life intolerable and create further hazards to the Send school now being rebuilt which is on the road and parents have to park their cars at the kerbside to drop their children off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/3037  Respondent: 10447777 / J Jordan  Agent: |
|---|---|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send and Ripley being taken out of the Green Belt. Having been assured by Cameron that he would protect the Green Belt, suddenly Send and Ripley are removed. On whose authorisation and for what reason. The narrow boat marina has already been approved and to be built on Green Belt land. When the Green Belt is built on it is gone forever and Send and Ripley will become part of the general sprawl linking to Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6551  Respondent: 10447777 / J Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send and Ripley being taken out of the Green Belt. Having been assured by Cameron that he would protect the Green Belt, suddenly Send and Ripley are removed. On whose authorisation and for what reason. The narrow boat marina has already been approved and to be built on Green Belt land. When the Green Belt is built on it is gone forever and Send and Ripley will become part of the general sprawl linking to Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/37  Respondent: 10447777 / J Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 2016 Plan put forward was rejected by local residents from over 32,000 objections largely by Send Residents. Is the GBC not listening? The stealing of Green Belt land for domestic and commercial expansion and the many points put forward on the lack of infrastructure and environmental reasons have simply been ignored.

The Government has made clear that Brown Field sites must be used for future development and Green Belt land only to be used in very exceptional circumstances. What are the exceptional circumstances in this case? Send village has been most disproportionately targeted by the GBC for the proposed developments as now shown.

Our village which has many narrow roads has problems now in handling traffic on a daily basis. The additional traffic will simply add to the gridlock situations that arise every day.

Two sites in our village have changed three times by the GBC namely Burnt Common and Garlick's Arch which are now both back in contention. What is going on? These latest changes are totally unacceptable. The GBC seem to have some kind of rigid agenda to ignore residents' comments and to destroy what we have for future generations and not taking into account the problems of infrastructure and the environment which is required by Law.
The previous comments still stand. Is the GBC not listening to the previous objections of local people?

There are no exceptional circumstances existing to continue and over develop the Green Belt in this beautiful village with history dating back to Elizabethen times. The purpose of the Green Belt must not be ignored. We must safeguard our wonderful woodland and open countryside. This particular land I understand is a flood zone 2 area and any further development will cause additional flooding during parts of the year. Local wildlife will also be affected. More additional traffic will bring pollution in air quality and noise. There is no justification for this proposal.

There is no need to build an industrial and warehousing development in the village of Send when Slyfield and Guildford have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole Borough, not this massive allocation of 10 hectares all at Send in the Green Belt. The impact of heavy industrial lorries and vans is totally unacceptable. The additional dust, dirt, noise and road gridlock is just too much.

Green Belt, Policy 2 at para.4.3.15

Send Business Park now taken out of the Green Belt in its entirety.

I strongly object to the proposal to remove Send Business Park from the Green Belt. It is effectively an old-conforming user in an area of beautiful open countryside enjoyed by local residents for walking and local wildlife all along the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/372</th>
<th>Respondent: 10447777 / J Jordan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn in Tannery Lane because instead of reducing demands the GBC have chosen to increase the number of new home by a third. All previous reasons for objection have been ignored making far worse the present access and traffic problems in Tannery Lane and the A247 junction. Send must retain its Green Belt and not add to the problems of surface flooding during parts of the year. The river Wey Navigational Canal which flows through Send is a natural beauty and views for walking in open countryside. This must not be impacted further.

The road along Tannery lane is so narrow cars have to stop and allow oncoming cars to pass in places.

Lorries jam up now, more will be ridiculous.

Any further development here is most unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | pslp172/374 | Respondent: | 10447777 / J Jordan | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to Policy A58 land at Burnt Common, London road. This is now a new allocation which was previously dropped from the 2014 draft Plan which was again objected to by the local residents and scrapped. All the previous objections still stand. This Policy has now been reintroduced with the wording from the previous 2016 Plan changed from "a MAXIMUM of 7,000 sq.ft to "a MINIMUM of 7,000 sq.ft. Just how much more development over 7,000 sq.ft is anticipated????

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/703 | Respondent: | 10447969 / John and Angela Symonds | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

What is it about Send Village that comes in time and time again for yet more houses? Could it be the easy access to the A3 or M25? We are a village with limited amenities. Doctors and schools at maximum intake. The A247 is already grid locked in the morning and evenings and our other roads are just country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/705 | Respondent: | 10447969 / John and Angela Symonds | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object most strongly on two accounts. The new last minute [text unreadable] of the precious Green Belt land at Garlick's Arch and the new 4 way interchange onto the A3 which would make our roads unbearable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10447969 / John and Angela Symonds</th>
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I also object most strongly to the Winds Ridge, Send Hill Site. 40 more homes and 2 travellers site would be totally unacceptable in what is a quiet country lane and no pavements. The plot many years ago was used as a landfill site and has vents, surely providing a point that this is not a suitable area to build on top of which - once again is green belt!

I though our problems would be eased after the last council of Mansbridge [text unreadable]. It appears not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1424</th>
<th>Respondent: 10447969 / John and Angela Symonds</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

To say that I absolutely have no faith in our Conservative Borough Council is an understatement. Elected again on the belief that they would help preserve our precious Green Belt - they seem to be hell bent on doing the exact opposite. All under the illusion of more affordable houses being built. Nonsense. When was there last a development of one or two bedroom houses or flats for the young and needy. Why? because the developers and councils alike keep more benefits from larger, more expensive buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7896</th>
<th>Respondent: 10448129 / Owen Jones</th>
<th>Agent:</th>
</tr>
</thead>
</table>
REPRESENTATIONS ON BEHALF OF BLOOR HOMES LTD AND MMES MELVILLE-RAE, CHICK, KELLOCK AND MCDAVID.

Introduction

Bloor Homes Ltd are working with Mmes Melville-Rae, Chick, Kellock and McDavid, to promote land at Gosden Hill Farm for future development.

Part of the land concerned is identified within the strategic allocation at Gosden Hill Farm which is the subject of Policy A25. The principle of this strategic allocation is supported.

In addition, a larger area of land immediately to the east of the allocated site, at Nutbourne Fruit Farm, is also promoted for inclusion as part of the strategic allocation. This parcel of land comprises a single building and an area of land used for car boot sales with its own access from the A3.

Scope of Representations

In these representations we comment on the following matters:

- The spatial strategy, the distribution of new housing and Green Belt;
- The scale of new housing proposed and the objectively assessed need; and
- The Gosden Hill strategic site

Together, the representations demonstrate why the Local Plan cannot presently be considered to be sound but that the allocation of this additional parcel of land will address this.

Gosden Hill Farm Strategic Allocation

We support, as a matter of principle, the identification of the strategic allocation at Gosden Hill Farm. Development adjacent to the main urban area affords sustainability and accessibility advantages and comprises a logical extension to the pattern of growth in Guildford contained by transport infrastructure. The mixed use nature of the proposed development envisaged by Policy A25 will lead to a juxtaposition of land uses that contribute to an intrinsically sustainable new community. Added to which, the transportation measures identified will strengthen accessibility to, and the vitality of, the town centre. Moreover, the Green Belt Study has identified the location (land parcels C1 and C2) as being of Medium Sensitivity; very few locations around Guildford have this status.

Within the Green Belt Study the land concerned is located within parcel C3. It is of note that within the Green Belt Purposes Assessment Schedule (page 28) the only Green Belt function that land within C3 serves is preventing neighbouring settlements from merging. It is this less significant that than within C2 which perform two Green Belt functions.

The land concerned is partly located within the strategic allocation; that being the land north east of Nuthill Farm. The remainder of the land is situated immediately to the east of the current boundary of the allocation. The land concerned is situated immediately south of the A3 (Ripley By-pass) and west of the A247. Overall, it measures approximately 19 hectares in size.
We are seeking the inclusion of this additional parcel of land for the following reasons:

The land use requirements of Policy A25 are considerable, as is necessary with a mixed use development of this scale. The land-take implications of these uses, the associated physical infrastructure requirements and the need to protect existing green infrastructure are similarly considerable. We note that the residential dwelling capacity of Areas C1 and C2 within the Green Belt Study identify on some 1600 new dwellings, somewhat below that required by the allocation. The additional land available at Nutbourne Fruit Farm will add surety that the strategic allocation can be delivered, thus its inclusion within the identified area will add flexibility to the plan.

The housing land supply strategy set out in Table 1 (when added to completions actual and estimated between 2013 and 2018) does not provide the necessary flexibility to give surety that the overall strategic housing requirement of 13,800 additional dwellings over the plan period will be met. With total supply estimated at on 14,400 additional dwellings, this represents less than 5%. This is not considered to be adequate in the circumstances of this plan and the nature of the housing supply strategy. Enlarging the Gosden Hill Farm allocation will further strengthen housing supply in a manner entirely consistent with the strategy.

None of this land is situated within the area of high sensitivity as regards Green Belt function and in this regard is indistinguishable from the allocation as a whole. Optimising development at Guildford through the inclusion of this land is beneficial to the release of less sustainable Green Belt land in villages and or less accessible non Green Belt land. Development of the parcels concerned will not lead to coalescence with West Clandon.

This amendment will be consistent with national planning policy, strengthening this flexibility and deliverability of one on the plan’s major housing allocations. The amendment sought is shown on the attached plan.

Without prejudice to the support given to Policy A25 and the proposed enlargement sought through these representations, we comment below on the infrastructure requirements identified for the proposed development.

The second bullet point refers to development proposal needing to have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road, and the A247 Clarendon Road.

At best this is an aspiration and is referred to in such terms in the June 2016 Transport Strategy. Put simply, the business case to secure such funding has not been made out and there are significant planning and statutory approvals that are necessary. To the best of our knowledge there are no plans to exhibit what is in fact referred to. The indicative programme within the Transport Strategy does not include reference to SRN11. Similarly, the associated Transport Topic Paper does not refer to SRN11. Neither is it referred to in draft Infrastructure Delivery Plan.

On this basis, the masterplanning exercise will need to adopt a realistic approach to the likely delivery of this so as not to preclude development opportunities unnecessary. The representors would welcome the opportunity of participating in the masterplanning exercise with Martin Grant Homes.

Summary

The representors own land that is identified within the Gosden Hill Farm strategic allocation which is the subject of Policy 25. They support the principle of this strategic allocation.

In addition, however, they seek the enlargement of this site to include an additional land parcel immediately north east of the current boundary of the allocation. The land concerned is no different in Green Belt categorisation to that of the land allocated. It is presently occupied by a single building and is used for car boot sales. Development would therefore represent a more effective use of the land concerned.

Enlarging the allocation in the manner proposed would provide additional development opportunities to ensure the housing requirements of the Plan are met.

This amendment will address the potential finding of unsoundness on the basis that the strategy is not fully compliant with national planning policy and will add greater flexibility.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160717 Gosden Hill Farm - Bloor et al.pdf (326 KB)

Comment ID: PSLPP16/18581  Respondent: 10448129 / Owen Jones  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Strategy

The supporting text to the Local Plan’s spatial development strategy – set out in paragraphs 4.1.5 to 4.1.9 - rightly identifies the pre-eminent role of Guildford within the Borough and the wider sub-region.

Para 4.1.6 identifies that Guildford Town Centre and Urban Areas is the preferred focus for development in sustainable locations, ahead of inset villages and identified Green Belt villages. In the context that these locations cannot meet all of the Borough’s development needs, the strategy, summarised at Para 4.1.8, rightly affords a role to urban extensions to Guildford, along with Ash and Tongham.

However, this strategy is not expressed in any Policy. Policy S2 simply concerns the quantum of housing and employment land and traveller pitches that are to be provided during the plan period.

As such, the Local Plan does not give the strategic direction to new development in a fashion appropriate to its role as the Development Plan. This should be corrected.

The location of future development and the strategy has been guided to a large extent by the Green Belt Study, given its extensive influence within the Borough. The Green Belt Study (Pegasus, 2013) states that opportunities to accommodate appropriate development within the designated ‘Countryside beyond the Green Belt’ located outside of the Green Belt ought to be explored prior to those located within the Green Belt. This is not consistent with national planning policy. As an approach, it ignores the emphasis in the NPPF on sustainable patterns of development being achieved when Green Belt is being reviewed. Indeed, the correct interpretation and application of Green Belt policy in the NPPF is to consider this as a factor in determining whether exceptional circumstances exist to amend the Green Belt rather than affording a priority to non-Green Belt land in the first instance.

Given the relative sustainability and accessibility advantages of Guildford, in comparison with other locations, the strategy should ensure that development opportunities around Guildford are prioritised and optimised in advance of consideration of other locations, be they beyond the Green Belt or development at villages inset within the Green Belt.

In this regard opportunities to enlarge the strategic allocation at Gosden Hill Farm should therefore be considered.

Housing Provision

The housing requirement set by the consultation document is specified in Policy S2 and intends for 13,860 new homes to be built over the plan period (2013-2033). This is derived from the October 2015 Strategic Housing Market Assessment undertaken for the West Surrey Housing Market Area. It proposes a housing requirement of 693 dwellings per annum (or 13,860 over a 20 year period). As para 4.1 of the SHMA (Guildford Summary) states, this, in accordance with the Planning
Practice Guidance, take account of the level of housing provision which is expected to be needed to support economic growth and improve affordability. As a principle, this is to be welcomed.

We are aware that the DCLG published new household projections in July 2016, which are, by definition, more recent than those upon which the SHMA is based.

Nationally, over the period from 2012 to 2037, annual average household growth is projected to be 214,000 per year, higher than the 2012-based household projections figure of 210,000 per year for the same period.

For Guildford, the SHMA draws upon the 2012 based household projects, which suggested a demographic need for 517 dwellings per annum. In contrast the latest 2014 based household projection (live table 406) shows a household change averaging 600 per annum between 2013 and 2033. Prima facia, these latest household projections, which are to be the starting point in determining housing requirements, suggest that the housing requirement in the consultation document needs to be reviewed and potentially increased.

Turning to the housing supply, and in the context of the likelihood that the housing requirement will need to increase, the estimates of supply do not provide sufficient certainty that the housing requirement will be met.

The housing land supply strategy set out in Table 1 (when added to completions actual and estimated between 2013 and 2018 from the Housing Land Availability Assessment) does not provide the necessary flexibility to give surety that the overall strategic housing requirement of 13,800 additional dwellings over the plan period will be met.

With total supply estimated at 14,400 additional dwellings, this represents theoretical oversupply of less than 5% of the strategic requirement. It is important to recognise that not all sites will be developed as anticipated, not all planning permissions will be implemented, permissions may lapse or sites may be developed for alternative uses. The flexibility proposed is not considered to be adequate in the circumstances of this plan and the nature of the housing supply strategy. This is especially the case when the evidence suggests that the housing requirement may in fact be a minimum requirement.

Moreover, it is necessary for the Local Plan to be founded on satisfactorily achieving the ‘duty-to co-operate’ requirement of the Act. In this instance, the inter-relationship with London is especially relevant, where is it already known that the City’s housing requirement is vastly greater than that which can be provided. The SHMA appears to set to one side the London Migration analysis, which would suggest an additional 568 households, in favour of the 2012 based household projections. Clearly, in the context of both the DTC and the most recent household projections this does not seem to be an appropriate assumption. This again implies a higher housing requirement will be likely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/446  Respondent: 10532449 / David Arthur  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings and the development of up to 600 houses in East Horsley

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow roads in Ockham, East Horsley and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25, specifically around junction 10 of the M25 and the A3 Guildford bypass. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities. We moved to East Horsley to enjoy living in the countryside not in an overpopulated urban sprawl.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2788  **Respondent:** 10533057 / David Martland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

It is hard to see how the NPPF objectives of sustainable development are going to be achievable with sites in areas which will more or less mandate car usage, and where alternative forms of transport are not always good. Any developments on the Wisley site will probably create significant transport requirements which will be difficult to satisfy as although changes have been made to local stations to accommodate longer trains, I believe it will be hard for the train operators to provide a significantly enhanced service with the greater capacity commensurate with the size of developments which might be proposed. Besides, sustainability does not mean that most people have to be commuters travelling into London, or occasionally Guildford and other locations. Other public transport in the areas around Horsley, Wisley and Effingham is currently rather poor, and subject to erratic change on a year by year basis. For example, the route into Horsley and Effingham (bus 479) was for a short period via Horsley, Effingham Junction and Bookham stations, thus making travel to and from stations easier. That only lasted a short while, and the current route for that bus now only travels via Bookham station, thus reducing the usefulness of bus as a mode of transport. Bus services are poorly used, but there is a chicken and egg situation, as if the buses don’t go where people need to travel, they will find other means, such as using private cars. Taxi provision in some areas of Guildford borough is expensive and not always reliable. There could usefully be some revision of how taxis operate. Many private taxi firms will charge high rates for local journeys, perhaps to discourage such journeys, as presumably journeys to the airports at Heathrow and Gatwick are more profitable.

While much of the plan is at a high level, I noted one detail at a consultation meeting. Many residents of areas such as Horsley and Effingham are now over 60 years of age, and have some mobility problems. Some are chronic, while others are temporary – for example after having had operations for hips, knees etc. Those older members of the community who do still try to travel by train can have difficulty at stations such as those at Horsley and Effingham Junction due to the need to cross the line by a footbridge, and there are no lift or other facilities to improve the situation for them. Indeed the advice for wheelchair users at Effingham going to London is to take the train to Guildford, then take the train back to London – to avoid crossing the line. This is really unacceptable. At Horsley it would be possible to improve the access to the station on the up-side (north of the railway bridge) by a footpath, which would allow rail travellers to reach the platform without having to go over the bridge, and a relatively easy slope would make that possible. Such changes and improvements to infrastructure could enable local residents to remain in their homes for longer, which might overall represent a more efficient use of houses and other facilities than creating pressure on them to move elsewhere or into care homes before they really feel the need to.

I hope that my comments regarding the revised plan will be taken into account.
I have read some of the documents on your website and it appears to me that some of the articles are written assuming that the decision has been made to house many more people than can be sustained in the area.

It is surely self-evident that traffic in the area cannot be increased without significant degradation of the living standards of the current population.

Two examples will clearly demonstrate this. The first is the commuter trains that head to London every morning and return every evening. Your staff, since they are based in Guildford, will not have experienced the overcrowding that is apparent every day of the week. Delays are frequent and the trains inadequate - among other things they do not have air-conditioning.

No doubt your response will be that the platforms are being extended and will be able to accommodate more passengers. My view is that, with the extended platforms, the current commuter traffic can be accommodated; not increased traffic resulting from all the additional houses that are planned.

Secondly, it appears from your plans that road traffic will be alleviated by the realignment of roads around the A3 / M25 junction. This is a complete fallacy. I travel on the road from Horsley to Cobham every weekday morning and find that 90% of the time the M25 heading clockwise is backed up and unable to move around 7:30 in the morning. What hope is there to improve this situation if the A3 / M25 junction is improved. This will do nothing to improve the traffic flow on the M25 which is already a dangerously crowded road at rush hour.

There are many other objections that I have and I feel that the views of the majority of current residents are being rode roughshod over by studies that purport to claim that the expansion of housing in the area will be achieved with minimal disruption.

I therefore submit my objection to these schemes in the strongest terms to ensure that the countryside is preserved and we do not all end up in continuous traffic jams and dangerously overcrowded trains.

I look forward to hearing that these plans are stopped in the near future and also look forward to your reply to confirm that you are of a similar view.

I wrote in 2014 to explain the reasons why I am very concerned about the number of houses planned for the area around the Horsleys. I have copied the email below.
Please note that I have also attached an article from the New Civil Engineer magazine which is the magazine of the Institution of Civil Engineers.

It highlights the problems encountered locally on the M25 at present and shows how the reliability of travel is declining year on year. Adding more houses in the area will only make the problem worse.

Finally, please explain why I need to write a second time on the same subject. You surely have the email below on record.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [IMG_20141005_0001.pdf](attachment:IMG_20141005_0001.pdf) (1.4 MB)

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Comment ID: PSLPP16/3585  Respondent: 10535105 / Andrew Lydon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read some of the documents on your website and it appears to me that some of the articles are written assuming that the decision has been made to house many more people than can be sustained in the area.

It is surely self-evident that traffic in the area cannot be increased without significant degradation of the living standards of the current population.

Two examples will clearly demonstrate this. The first is the commuter trains that head to London every morning and return every evening. Your staff, since they are based in Guildford, will not have experienced the overcrowding that is apparent every day of the week. Delays are frequent and the trains inadequate - among other things they do not have air-conditioning.

No doubt your response will be that the platforms are being extended and will be able to accommodate more passengers. My view is that, with the extended platforms, the current commuter traffic can be accommodated; not increased traffic resulting from all the additional houses that are planned.

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There are many other objections that I have and I feel that the views of the majority of current residents are being rode roughshod over by studies that purport to claim that the expansion of housing in the area will be achieved with minimal disruption.

I therefore submit my objection to these schemes in the strongest terms to ensure that the countryside is preserved and we do not all end up in continuous traffic jams and dangerously overcrowded trains.

I look forward to hearing that these plans are stopped in the near future and also look forward to your reply to confirm that you are of a similar view.
I am extremely concerned with the proposals that are laid out in the New Guildford Plan. Building over 12,000 houses will cause enormous disruption during the process and subsequently when these houses are occupied. Examples of my concern include:

1) Additional traffic at the A3 / M25 junction which is already heavily congested at rush hour.

2) Additional cars at the Horsley shops by the station and near the Duke of Wellington. These shops are crowded already particularly on Saturdays.

3) The potential increase in cyclists’ deaths on the roads around Horsley and the Wisley airfield. The road from Cobham to East Horsley is already heavily trafficked by cyclists. Heavy lorries during construction and subsequently traffic from the owners of the new houses will significantly increase the risk of deaths.

4) The train service from Horsley and Effingham Junction is already overloaded at rush hour. The additional house will make commuting by train to London impossible; if not for Horsley and Effingham Junction users then further up the line to London.

5) It is interesting to note that the golf course in The Drift was planning to re-landscape the course. There were objections from the council complaining that heavy lorries would be dangerous around the narrow roads around East and West Horsley.

6) The narrow roads in the area cannot accommodate such heavy additional traffic.

I request that you reconsider such a plan immediately to prevent the congestion (and potential deaths) that will come from such ill-thoughtout ideas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Garlick’s Arch, Burnt Common

I strongly object to the proposed to develop the land known as Garlick’s Arch, Send Marsh/Burnt Common. This is a last minute change to the Local Plan and the manner in which this proposal was added by stealth is completely unacceptable. Due process was not conducted. My comments need to be seen by the Planning Inspector.

Public opinion is crucial as we all have to live and thrive in a community. Some reasonable growth in housing capacity is required and this has to be managed carefully and appropriately. The proposed development of in excess of 400 homes plus warehousing and industrial units is quite frankly ridiculous. The area simply cannot take any more. In the GBC’s literature (‘About Guildford’, Summer 2016) you state the following:

“One of the borough’s biggest assets is our significant green belt, and major consideration is given to protecting this.”

Borough Council election promises were to protect the Green Belt; evidence so far indicates that you are breaking these promises.

Key Reasons for objecting:

- **Traffic Congestion:** I object to what will be addition to the already congested roads in Send, Send Marsh and Ripley. The infrastructure in the area is not simply sufficient for hundreds of additional cars, haulage vehicles and cyclists, etc. The whole road system suffers greatly at peak times. g. travelling from Send to Woking station takes ¾ hour rather than the usual 10 - 15 minutes. Ripley High Street cannot cope with the peak traffic at the beginning and end of the day even now let alone with more and more vehicles being channelled through the bottlenecks of Ripley and Send. Send Marsh Road, Portsmouth Road into Ripley and Send are already highly congested in the mornings and a further 400 houses cannot be tolerated on the road infrastructure. The M25/A3 Junction 10 is clogged from 0700 in the morning to well after 0900 and the tailbacks on the M25 towards junction 10 from the east start from at least the Leatherhead junction. More vehicles as a result of all the potential new houses are going to create mayhem, further delay and accidents.

- **The quality of the roads:** I object to the quality of the roads; both in terms of surface and width simply are not up to greater use. There are many pot holes causing damage to cars and cyclists (NB personally experienced damage to the car) and the situation will only worsen with the greater population

- **Local services:** I object to the already stretched local services and facilities in the immediate area. The Villages Surgery that services Send, Send Marsh and Ripley – would not be able to take more and more people. It is already nearly impossible to get an appointment with a Doctor. Local schools do not have the capacity for more people. The letterbox at the junction of Send Marsh Road and Portsmouth Road has just been removed; again an underhand move I suspect with Royal Mail without consultation, as I expect you are already preparing the changes to the Send Marsh Road junction

- **The beautiful countryside:** I object to the fact that the countryside surrounding Send, Send Marsh and Burnt Common is at risk of being lost. It needs to be preserved for future generations to enjoy. The area of Garlick’s Arch is agricultural green belt and ancient woodland and offers the appropriate break between the residential areas of Ripley and Send Marsh from the busy and noisy A3. I object to the continued onslaught by GBC of taking green belt land from the area which provides good breaks between Guildford, Woking and from the busy A3

- **Air Quality:** I object to the air pollution that will be greater if the industrial units and additional housing are built. More vehicles (especially haulage) will cause pollution. The area of Ripley, Send Marsh and Send are in a dip and has a micro climate; air pollution will languish in this dip

- **The need for additional housing:** I object to the assumption that additional housing is required in Send and Send Marsh. The need is simply not proven
• Industrial units: I object to the proposed relocation of industrial units from the proposal at Slyfield where there is sufficient and wanted expansion there

• The outlook from the Maple Road development in Send Marsh: I object to losing the view of the beautiful canopy of trees that line the view towards the A3 from Maple Road. The proposed development at Garlic’s Arch will destroy the skyline

Please do not destroy the existing communities that live in harmony with their environment (only just!) within the Send, Send Marsh, Ripley and Clandon areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4472  Respondent: 10540161 / Shelagh Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposed to develop the land known as Garlic’s Arch, Send Marsh/Burnt Common. This is a last minute change to the Local Plan and the manner in which this proposal was added by stealth is completely unacceptable. Due process was not conducted. My comments need to be seen by the Planning Inspector.

Public opinion is crucial as we all have to live and thrive in a community. Some reasonable growth in housing capacity is required and this has to be managed carefully and appropriately. The proposed development of in excess of 400 homes plus warehousing and industrial units is quite frankly ridiculous. The area simply cannot take any more. In the GBC’s literature (‘About Guildford’, Summer 2016) you state the following:

“One of the borough’s biggest assets is our significant green belt, and major consideration is given to protecting this.”

Borough Council election promises were to protect the Green Belt; evidence so far indicates that you are breaking these promises.

Key Reasons for objecting:

• Traffic Congestion: I object to what will be addition to the already congested roads in Send, Send Marsh and Ripley. The infrastructure in the area is not simply sufficient for hundreds of additional cars, haulage vehicles and cyclists, etc. The whole road system suffers greatly at peak times. E.g. travelling from Send to Woking station takes ¾ hour rather than the usual 10 - 15 minutes. Ripley High Street cannot cope with the peak traffic at the beginning and end of the day even now let alone with more and more vehicles being channelled through the bottlenecks of Ripley and Send. Send Marsh Road, Portsmouth Road into Ripley and Send are already highly congested in the mornings and a further 400 houses cannot be tolerated on the road infrastructure. The M25/A3 Junction 10 is clogged from 0700 in the morning to well after 0900 and the tailbacks on the M25 towards junction 10 from the east start from at least the Leatherhead junction. More vehicles as a result of all the potential new houses are going to create mayhem, further delay and accidents.

• The quality of the roads: I object to the quality of the roads; both in terms of surface and width simply are not up to greater use. There are many pot holes causing damage to cars and cyclists (NB personally experienced damage to the car) and the situation will only worsen with the greater population
- **Local services:** I object to the already stretched local services and facilities in the immediate area. The Villages Surgery that services Send, Send Marsh and Ripley – would not be able to take more and more people. It is already nearly impossible to get an appointment with a Doctor. Local schools do not have the capacity for more people.

- **The beautiful countryside:** I object to the fact that the countryside surrounding Send, Send Marsh and Burnt Common is at risk of being lost. It needs to be preserved for future generations to enjoy. The area of Garlick’s Arch is agricultural green belt and ancient woodland and offers the appropriate break between the residential areas of Ripley and Send Marsh from the busy and noisy A3. I object to the continued onslaught by GBC of taking green belt land from the area which provides good breaks between Guildford, Woking and from the busy A3.

- **Air Quality:** I object to the air pollution that will be greater if the industrial units and additional housing are built. More vehicles (especially haulage) will cause pollution. The area of Ripley, Send Marsh and Send are in a dip and has a micro climate; air pollution will languish in this dip.

- **The need for additional housing:** I object to the assumption that additional housing is required in Send and Send Marsh. The need is simply not proven.

- **Industrial units:** I object to the proposed relocation of industrial units from the proposal at Slyfield where there is sufficient and wanted expansion there.

- **The outlook from the Maple Road development in Send Marsh:** I object to losing the view of the beautiful canopy of trees that line the view towards the A3 from Maple Road. The proposed development at Garlick’s Arch will destroy the skyline.

Please do not destroy the existing communities that live in harmony with their environment (only just!) within the Send, Send Marsh, Ripley and Clandon areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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Attached documents:

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<th>Comment ID: pslp172/454</th>
<th>Respondent: 10540161 / Shelagh Smith</th>
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**Policy A42 – Clockbarn Nursery, Tannery Lane. I strongly object** to the change of increasing the number of homes in the draft local plan. As in my comments in the paragraph above, this is in an area of natural beauty and it will be destroyed by building upon it. The traffic infrastructure simply cannot take it. Send and Ripley are already gridlocked during a high percentage of each week as it is!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Policy A43 – Land at Garlick’s Arch, Send Marsh. I strongly object** to the change of increasing the number of homes because it simply disregards all previous legitimate objections. The loss of the well developed woodland would have catastrophic effect on noise and air pollution levels. The current dense woodland absorbs much of the vehicle exhaust fumes from the A3 traffic (which is consistent 24 hours a day) and helps to reduce noise levels for the neighbourhood. All plants and trees absorb pollution. Please remember that Send and Send Marsh are in a geographical dip and air pollution is caught in this dip. In addition, there will be over development of our village which is already struggling with lack of infrastructure (traffic and services).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</th>
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**Policy A58 – Land at Burnt Common. I strongly object** to the new allocation for a minimum of 7,000sq m of industrial or warehousing. This is a change from the previous ‘maximum’ in the 2016 plan. There is simply not the demand for this type of development. In addition, the roads are already plagued with too many lorries which causes disruption, damage to roads/kerbs and creates more and more pollution.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

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<th>Comment ID: PSLPP16/223  Respondent: 10540225 / Peter and Judy Davies  Agent:</th>
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We write again, as we did in 2014, to protest strongly against the new Local Plan and the effect it will have on East and West Horsley. We came to this locality ten years ago, having lived in Guildford for over 30 years, with the hope of spending our retirement in a village community and in an area guarded by green-belt legislation.  

This new Local Plan is, once again, an attack on the green belt, in that much of the area is now being changed as a result of a new “village boundary”. The large number of new houses planned for our two villages will have a huge adverse effect on the present community and the balance we now have of shops, schools and light industry. Our narrow road system already suffers from too much traffic, and the dangers will be heightened.  

This Local Plan, ill-judged like its predecessor, and published despite strong local opposition, gives the impression of an act of planning vandalism against a semi-rural part of the Borough. What more do people have to do to voice their dissent?  

It is evident that if the development of the Wisley airfield proceeds, all we say will be exacerbated greatly. We strongly object to that too.  

Surely the Borough has a duty to protect its inhabitants, having regard to where they now live and the manner of living they now enjoy. Your Plan takes no account of that. Please will you listen to our objections.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

| Comment ID: pslp173/131  Respondent: 10540225 / Peter and Judy Davies  Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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We have objected to the Plan in previous years on a number of grounds, including -

1. the removal of the benefits of green belt status for East Horsley;
2. the very adverse effect the Plan will have on our village life, with a much increased population but no corresponding improvement in roads and road use, parking, schools, medical facilities;
3. the significant additional effect on this infrastructure of the proposed development of Wisley airfield.

The 2017 Plan shows limited changes to the previous plan, and all these concerns remain.

What is puzzling and angers many of us is that the original idea of consulting the local population was made with much ado. Our voice was to be heard and acted on. The huge response showed an overwhelming wish not to endanger the green belt. Yet the 2017 Plan is largely unchanged, and the same concerns apply.

Is your lengthy and costly consultation only a sham? Is this Plan to go ahead regardless of what most people sincerely feel? Who does the Borough Council represent?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/7058  Respondent: 10540609 / D R Medhurst  Agent:  

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the proposal of building 140 new dwellings plus a care home on land bordering Keens Lane for three main reasons:

1. The site being proposed is in very close proximity to Whitmoor common which is a designated SPA and as such should be protected from the affects that any nearby housing would bring.
2. Keens Lane would lose completely its current rural charm.
3. The area is designated Green Belt and as such should not be built upon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/5681  Respondent: 10541313 / Ann Medhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also am entirely opposed to the University Plan to build a vast number of houses on land at Blackwell Farm. I did query the building of the Sports Centre and although it is very nice, is it really used to the full potential by the University and local area? If houses or student flats had been built instead we would not be in such a crisis situation now with lack of available accommodation.I certainly do not agree with vast swaths of the Hog's Back being turned into a housing estate. However, a few three story flats at the lower end would not have such an impact and as there is such a need I would agree with that idea.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11225  Respondent: 10541313 / Ann Medhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

firstly I do appreciate the need for more housing, especially at the affordable prices but I do not agree with the premise that there is no available land other than Green Belt Land. I feel that this land is sacrosanct and should not be used at any cost. If once we start infringing it 1.6% this year and another percentage another year, in no time at all it will be gone. I feel this is our inheritance for future generations and we should protect it at all costs. I know it is a timely exercise but there are available small brown fill sites to be found which could be used instead. Of course the plan for 140 houses near to us at Keen ’s Park could not be accommodated in small areas, but if each area had half a dozen the impact would not be so great and pressure on the infrastructure would be far less. As to the mentioned 140 houses, it is far too many for our area and this will greatly impact the green corridor to Whitmoor Common which the environmentalists are so keen to preserve, and I agree with them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3952  Respondent: 10543777 / Gordon Fullick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A23
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object to the land North of Saltbox Road being developed as a burial ground. The site is within the Green Belt and is bordered almost entirely by protected areas of Whitmoor Common including a SPA. We do not feel that Guildford Borough Council has proved beyond any doubt that this site must be developed as a burial ground. There is enough burial space for all who want it (for 40 years) within the parish of Worplesdon at St. Mary’s Church, Brookwood Cemetery offers a burial 10 anybody who lived within 17 miles of the Cemetery and there is a natural burial site at Clandon (Mole Valley Council use this for their residents). There are crematoria in Guildford (to be refurbished as 72% of the people of this country opt for cremation) and Woking. Godalming Borough Council has offered Guildford residents burial space (enough for many years) at Eashing Cemetery which is approximately the same distance from the centre of Guildford as Guildford Crematorium. The signage and lighting and the considerable building work (see below) would conflict with the openness of the Green Belt and the wild life would suffer through noise and light pollution (there would be lights for the offices, and ceremony room, to deal with unsocial behaviour and facilitate grave digging). Deer have been seen grazing on the site now that the horses have moved away and bats have been reported there.

If you refer to our local Ordnance Survey map you will see from the contours that the site has a considerable slope from from Mount Pleasant (45 AOD) down to Saltbox Road (41 AOD). This slope is not mentioned in the report prepared for the owners of the site. (Please refer to your “get involved” website.) This is very obvious from our lounge, dining room and bedroom windows and our back garden. We can see most of the field despite a six foot fence/wall around our garden. The field is bordered by a natural deciduous hedge and trees.

If you refer to the Environment Agency map (which is Appendix 0 Risk of Ground Water Flooding on your website) you will see that the area around and within our garden and down towards the railway bridge (including the triangle of common land at the lower right-hand boundary of the site which flanks the road leading UIJ to Mount Pleasant) is at risk of severe surface water flooding. Our garage which is close the Southside of Saltbox Road floods regularly. We are told this is surface water run-off from the surrounding areas! The tenants who rented "the horsefield" for grazing for 25 years say that the site floods (This is recorded on your get involved website). There is also an attenuation water course which runs under Saltbox Road to Brittens Pond which is very close to this site.

The site would require a car park (despite your remarks) as all average between 40 and 80 people attend a burial (more for natural burials which must be catered for and for some religions when the whole ceremony has be held by the grave). Parking all Saltbox Road is forbidden. Parking is not allowed on our grass verges as these are sights plays because of the dangerous bend and camber of the road and it was Highways Authority planning condition that they must not be obstructed. Parking inside Saltbox Cottages, an unadapted road without invitation is trespassing. The road UP towards Mount Pleasant is narrow. Grange Road already has a major problem with on-street parking and Cumberland Avenue is sometimes impassable by buses because of parking. Public transport is limited and walking from the Britten's Pond carpark or Saltbox Road carpark would encourage mourners (often elderly) to walk in the road and under the railway bridge which is dangerous. There are no residential roads that can lake the excess parking as there are near Stoke cemetery. There would be a large ceremony room (or perhaps several because 10 comply with the law it would be a multi-faith site) plus a waiting room, toilet facilities, gatehouse, storage and offices. We worry that this amount of building and the graves themselves would cause obstruction to the natural drainage process through the grass and it would increase our flooding and the "wetspot" under the railway bridge would flood frequently closing the road to traffic as has happened on many occasions in the past. We fear contaminated "grey" water would drain on our property and the SPA. Our water supply enters the property car our gale on Saltbox Road. The carpark would encourage dogwalkers onto Whitmoor Common as the gate of the burial ground would be open from dawn to dusk 364 days a year and despite the remarks in the draft plan we fail to see how cars entering the site could be checked for dogs or people stopped when leaving through the gate with a dog on a lead!!! Increased damage to the heath land, SPA and wild life would be inevitable. All the building materials and equipment would come past Whitmoor Common because the railway bridge furtherdown Saltbox Road is too low for larger HGVs which frequently get stuck (despite signage) and cause disruption to the traffic.
The cross roads and pedestrian crossing would be car the dangerous bend in the road and would cause more congestion. There is no public transport along Sailbox Road and no pavements as the road is bordered by common land. Nobody knows how much traffic will be generated by the 1,000 houses, the primary school and the increased business opportunities in the Slyfield area and even if the CLLR is built many of the vehicles from there will travel along Saltbox Road on their way to and from Bagshot and beyond and schools and work on the other side of the Worplesdon Road and vice versa. This together with potential building at Keens Lane, Merrist Wood and Tangley Lane can only add to the problem. Salt box Road is approximately one mile long with a roundabout at each end and traffic lights in the middle. In the rush hours and at many times during the day the traffic struggles to negotiate the roundabouts resulting in traffic jams in both directions outside our gate which spread onto the Waking Road, Worplesdon Road and Grange Road. The northern ring road is not and will not be a thing of the past so please do not make it worse! We call no longer sit in our back garden which borders Saltbox Road (less than three meters from our fence) because of the fumes from the stationary traffic, the rattling of the HGYs and the noise from car radios. It is impossible to hold a conversation. The only respite we get is about three hours in the middle of Christmas Day. The cumulative increase in traffic will overwhelm Saltbox Road,(which was congested before Queen Elizabeth Park was developed) Worpleston and us. The Campaign to Protect Rural England reports that developments in Mayford will also impact on Saltbox Road which is a C road " under stress". Any development on this site particularly involving public access would be disastrous for many reasons and it should be retained as grazing land or added to the common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 change at Clockbarn Nursery, Tannery Lane due to the following points:
The site has very restricted access along Tannery Lane which is single track for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical with 45 homes, so an increase of 33% is just ridiculous.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with traffic for 45 extra homes, so an increase is not going to work.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. The traffic for this development has not yet been added to the current traffic situation.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane, so an increase in homes just exacerbates the problem.

This change ignores hundreds of previous objections. These have been made by people who live locally, the people who know the area best, they should be listened to, not pushed to one side.

Surface water flooding will be increased with the original number of homes, additional homes will make the situation worse still.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3499  Respondent: 10543937 / Sarah Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no proven demand for plots to accommodate Travelling Showpeople.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt land. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. It constitutes over development. These further changes to the plan are not required. It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.
This area contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it.

This site is identified as being in a Flood Zone 2 and regularly floods during winter months.

This site contains land which is heavily contaminated by many years of shooting with lead shot.

Above all, the changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the 2016 Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/3501   Respondent:  10543937 / Sarah Wright   Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Burnt Common due to the following points:

There is no requirement for new industrial or warehouse space as there is availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

According to the 2017 Employment Land Need Assessment there is a reduction in demand to 3.9 hectares for industrial land in the whole borough. Why is there a huge allocation of 10 hectares in Send? This policy has not been thought through at all.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

This site was deleted from the 2014 Local Plan due to previous objections, why has it returned?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/6546   Respondent:  10544033 / Angela Hicks   Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the draft local plan. I see that although the application for a development of over two thousand houses on and adjacent to Wisley Airfield (a New Town) was well and truly rejected, it is still on the draft plan. The idea of what is virtually a new town on the Green Belt of Surrey's countryside is appalling. The object seems to be to turn the beautiful Surrey Green Belt into one vast conurbation. The Green Belt areas were left as green 'lungs' between conurbations and were to be sacrosanct. It seems that there is no interest in 'brownfield' sites, maybe because they are more expensive to develop. It now appears that it is proposed to take three villages out of the Green Belt. (including Ripley, a charming small 'English' village, where I live). This would defeat the object of the Green Belt.

Apart from the issue of the Green Belt, there is also the issue of overcrowding of the narrow country lanes (I live on a lane where two cars cannot pass) and the consequent bottlenecks and gridlocks in local Guildford and on the A3 at busy times. It would appear that The 'Local Plan' would seek to increase the housing and business supply by 25 per cent over the next 15 years. The occupiers of any new properties would doubtless have two cars and add to the chaos. The infrastructure will not bear any further burdens. The local bus service is being reduced, the local Secondary Schools are already fully subscribed. It would seem that taking these three small country villages out of the Green Belt would only add to the danger and disruption of this already busy countryside. Please be guided by the people who live in the surrounding areas and let us keep our Green Belt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/273   Respondent: 10544353 / Janet Govey   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED. You are not following the letter of the law, follow consultations and listen to public objections, stop trying to bring in underhand changes.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.
I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work. I live on the A247 this road is always busy with extremely fast traffic, it can not take that volume of traffic as the local infrastructure is not good enough.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches. I appreciate they need somewhere to live, but this access is particularly bad and the road is busy enough with school traffic.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic. My son lives in Send and was unable to get into his nearest school as it was full!! Where are all these new children going to go!! The school is being rebuilt but not any bigger!! The extra land is being used for housing, more children, traffic and patients for doctors surgery.

Pls listen to public objections

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<tr>
<td>I object.</td>
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<td>If you want to build more houses then you should improve the infrastructure first i.e. road, public transport, the hospital, the university, schools, amenities, more doctors surgeries, more NHS dentists etc. and build affordable houses please.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object.</td>
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<tr>
<td>If you want to build more houses then you should improve the infrastructure first i.e. road, public transport, the hospital, the university, schools, amenities, more doctors surgeries, more NHS dentists etc. and build affordable houses please.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPS16/7979  Respondent: 10550913 / Nathaniel Lichfield &amp; Partners (Tor Barrett)  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A33</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Background

The University is the UK’s longest established specialist provider of legal education and can trace its origins back to 1876. The University moved to Braboeuf Manor on the Old Portsmouth Road in 1964. The campus comprises teaching accommodation and the University’s main office functions. The site is currently in D1 Use Class.

The Guildford campus has expanded since 1964 to provide additional on-site teaching accommodation. Approximately 700 students are currently educated at the Guildford campus and the University intends to increase the number of undergraduate places in law courses as well as introduce new business degrees at both undergraduate and postgraduate level at the University over the coming years. Accordingly, it is anticipated that the number of undergraduate and international students at the University will increase over the coming years. Both cohorts expect universities to provide student accommodation.

At present all the University students live off-site. The University does not own its own accommodation but instead has an arrangement with a number of private landlords who are able to offer some accommodation i.e. rooms in a shared house. The quality, type, extent and location of accommodation available in Guildford does not adequately provide for the needs of the University and is severely hampering its ability to attract students and grow in the future. These issues are exacerbated by the high cost of living in Guildford and raising expectations of the standard of accommodation required by students across the UK. It is vitally important that the University students have access to quality accommodation on-campus in the future and therefore the University welcomes the site allocation for student accommodation in response to the submission to the Council’s Call for Sites in January 2015.

The inset of the site from the Green Belt in paragraph 4.3.13 is also strongly supported by the University. The insetting of the site is considered to provide much needed flexibility to greater assist the University in meeting the needs of its students in the future. This approach by the Council is considered to be a positive response to paragraph 27 of the National Planning Policy Framework (NPPF) which encourages local planning authorities to take a proactive, positive and collaborative approach to development that will widen the choice in education.

However, the current drafting of Policy A33 for the site allocation states that “building higher than two storeys are unlikely to be suitable” and the associated plan limits the site of development to the existing car park in the north east corner of the site. These requirements are considered to unreasonably restrict future development at the site and for these reasons the University cannot support the site allocation in its current form. This is further explained below.

Site Location

The site location map appended to the site allocation identifies the development as appropriate within the car park to the north west corner of the University Campus. This reflects the positioning of the most recent schemes for future student accommodation. Nevertheless, the scheme for student accommodation on site is still emerging. Accordingly, it is important that the site allocation is sufficiently flexible to allow potential changes to the scheme in future, including a slightly amended layout, if required. The proposals would be appropriately assessed as part of the planning application process in terms of ecological, visual and heritage impact. Consequently, it is considered that the site allocation map should include the whole campus as subject to the site allocation, in line with that submitted as part of the Call for Sites Form submitted in January 2015.

Building Height

With respect to building height, the draft site allocation includes the following as one of its requirements:

“Significant regard to height of buildings (buildings higher than two storeys are unlikely to be acceptable)”.

This is a significant concern for the University in terms of the viability of the scheme. It is considered that in order for the scheme to be viable a building of more than two storeys is required. Paragraph 173 of the National Planning Policy Framework (NPPF) identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Given that the scheme is still emerging, it is considered that the site allocation should be flexible in its wording to ensure that a viable scheme can be established. Accordingly, it is considered that in this case the statement that “buildings higher than two storeys are unlikely to be acceptable” is unreasonably restrictive on future development and should be removed.
Alternatively, it could make reference to the height of development being a sensitivity in planning policy terms, which would need to be tested as part of any planning application process.

Furthermore, the pre-application request submitted to the Council in March 2015 presented a scheme of 4 storeys which stepped up in response to the ground levels of the site. The pre-application advice (ref. 15/A/00333) stated that “the Council is unlikely object to the scale or height of the building where this does not give rise to harm such as harm to the AONB or harm to the Conservation Area.” Should it be decided to proceed with a development on the site, any harm associated with the building height will be fully assessed as part of the planning application process. The restriction to a height of two storeys in the site allocation is therefore considered to be excessive and unnecessary.

**Conclusion**

Para 4.2.18 of the Proposed Submission Local Plan states that to minimise pressure on the existing housing stock it is important that any significant increase in full time student number is matched by the provision of purpose built student accommodation. The University has continued plans for expansion including the increase of undergraduate and postgraduate students requiring on site accommodation and consequently intends to deliver on site student accommodation.

The University therefore welcomes the inset of the site from the Green Belt to better meet the needs of its students in the future. In addition the allocation of the site for student accommodation is strongly supported. However it is considered that the building height requirement and site location map are unduly restrictive on future development schemes, particularly in terms of viability. A scheme for student accommodation at the site is still emerging and accordingly it is considered that the site allocation should be sufficiently flexible to allow an appropriate and viable scheme to come forward. The location and building height would be rigorously assessed as part of any planning application to ensure acceptability in terms of the impact on the Green Belt, Area of Outstanding Natural Beauty and Conservation Area for example. Accordingly, these restrictions in the policy itself are unnecessary.

We trust that the above comments will be taken into account by the Council during the preparation of the Local Plan for submission to the Planning Inspectorate for examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 13544 GBC (Local Plan Reps) 18-7-2016.pdf (105 KB)

Comment ID: PSLPP16/17658  Respondent: 10550913 / Nathaniel Lichfield & Partners (Tor Barrett)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The inset of the site from the Green Belt in paragraph 4.3.13 is also strongly supported by the University. The insetting of the site is considered to provide much needed flexibility to greater assist the University in meeting the needs of its students in the future. This approach by the Council is considered to be a positive response to paragraph 27 of the National Planning Policy Framework (NPPF) which encourages local planning authorities to take a proactive, positive and collaborative approach to development that will widen the choice in education.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: ![13544 GBC (Local Plan Reps) 18-7-2016.pdf](13544 GBC (Local Plan Reps) 18-7-2016.pdf) (105 KB)

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More traffic, more pollution for a village that is already struggling along with The extra people needing the medical centre that is full to capacity and school places, limited travel from our rural bus service and few shops surely is not ideal. All the above needs addressing most importantly the road infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy A42 Clockburn Nursery, Tannery Lane this site is classified as agricultural in the green belt. Access is unsuitable either way you whether off Send Road which is very busy and congested at peak times or via Papercourt Lane which is narrow. Tannery Lane itself is a very narrow bendy lane with poor sight lines and under pressure from existing traffic as there are many places that two cars cannot pass each other, the lane has no pedestrian footpath apart from a narrow uneven pavement at the top of the lane, the lane is prone to flooding. We have to consider planning application 04/P/00576 for 64 apartments already approved with the addition of these suggested 45 it would result in an increase of 500%. Also the recent approved application 16/P/002289 land to the north of Tannery Lane and east of Wharf Lane is noted that the nursery to the west of this site is Clockarn site A42 provides foraging habitat for bats. This would appear as a mitigation measure for approval of 16/P/002289 and it would not now be appropriate to destroy this wildlife corridor to the west of the marina development by building houses on the site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to A43 Garlicks Arch and A43a proposed slip roads. 400 homes will have a huge impact on Send, Send Marsh, Burnt Common, Ripley and Clandon, the already congested roads will be at full capacity, traffic is already stacked up at peak times on the roads around this area a lot of the roads are no more than country lanes causing chaos as drivers try to avoid sitting in waiting traffic. The loss of the Woodland and farming land along with wildlife habitat is too great for the surrounding villages. A recent application for 25 houses on the Oldlands site was refused so how is 400 right this time surely the same refusal comments and reasons would still apply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy A44 Winds Ridge, this land is in the green belt and access to the proposed site is via Send Hill which a narrow road with no pedestrian pavements. The houses on this site will alter the beautiful views across the fields and grazing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15198</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 Village will be Inset from the Green Belt. A lot of this forms the Wey Navigation Corridor and habitat for wildlife and needs protecting, also the village could see more development not set out in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3968  Respondent: 10551617 / L Truscott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery as I did previously and feel that to increase the number of homes from 45 to 60 in this draft and at this location after previous objections is unacceptable. Tannery Lane is a narrow lane at either end with no pavement apart from 250 metres on one side from the entrance off the A247 and many of the homes have no off street parking and park on the road causing passing problems to vehicles using Tannery Lane. The junction of Tannery Lane with the A247 is dangerous despite the recent addition of double yellow lines as the sight lines pulling out are very bad, this will worsen with the increased traffic from the proposed houses. The infrastructure of the A247 is at full capacity during rush hour with traffic queues and busy throughout the whole day any additional traffic will worsen this problem. Tannery Lane suffers from problems with Lorries and cars trying to pass on route to the Send Business Park, this will also become busier as the recent planning application for the Marina was passed and work has started. I have concerns for the Flora, fauna and wildlife in this area such as bats, deer, foxes and many different species of birds. This development could have an impact on the countryside and could affect the view from the Wey Navigation. Finally Tannery Lane is prone to flooding and this would need to be addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3970  Respondent: 10551617 / L Truscott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 which I previously objected to that this land is Green Belt, with ancient woodland. The development would have a huge impact on the Flora, fauna and wildlife in the vicinity and development on this land will join the villages of Ripley and Send together defeating the object of the Green Belt. The local roads, doctors, schools, amenities are already struggling to cope with the existing residents and would be under pressure and would definitely not be fit to serve residents from another 400 homes.

Finally the housing numbers in the Local Plan has reduced by 39 per annum but Send’s contribution has increased with no justification, I therefore feel that consideration should be made to firstly the existing infrastructure especially A247 Send Road, Clandon Road and Portsmouth Road at Ripley, the bus service, doctors, schools, shops etc. should any development within Send be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3969  Respondent: 10551617 / L Truscott  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 which was deleted from the 2014 draft, Industrial and Warehousing in this area will have a huge impact on all the local roads. Guildford Borough Council are not in need of moreIndustrial units as stated by them in a recent planning application at Tithe barn Farm to replace existing storage and warehouses with a small development of houses, Slyfield Industrial Estate is not used at full capacity so there is no need to build this in the middle of the Green Belt when other Brown site are available sited in a better location with better access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2026  Respondent: 10551617 / L Truscott  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Green Belt Policy 2 paragraph 4.3.15 the proposal to inset Send Business Park from the Green Belt because of the narrow vehicular access at either end of Tannery Lane. The Business Park is situated adjacent to the River Wey and any further development of this area would ruin the openness of the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/301    Respondent: 10551841 / N C and N O Brown    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to make the following objections to the draft local plan.

I object strongly to the last minute addition to the local plan of 400 houses at Garlicks Arch - Site A43. Adding this proposal at the 11th hour seems at the very least underhand and smacks of trying to circumvent a proper consultation process. The proposal for 400 houses seems completely out of proportion and would put a severe strain on the local infrastructure and in particular traffic congestion. We saw a reduction for housing provision in Send from the 430 proposed in 2014 to 185 in April this year - so the dramatic and last minute increase to 485 is huge and goes against previous thinking. There are important environmental issues too as this 100 acre site containing ancient woodland would be lost forever.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to the proposed industrial space of 7000 sq m at Garlicks Arch, Burnt Common - Site A43a as there does not seem to be a proven need. Indeed, if such a need was established, brownfield sites should be sought before eroding green belt land. It is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the proposed new 4 way junction at Burnt Common as this will massively impact on the local area and Send in particular. There is already a problem with traffic which at rush hour involves serious queuing and the A247 is likely to be gridlocked all day if this junction were to go ahead because of the additional volume of traffic. Send would be used as a cut through to the A3 and the M25. I object to the A25 Gosden Hill Farm 2000 housing proposal - such a proposal would hugely increase traffic levels if this 4way junction were to go ahead, causing significant traffic flow problems so close to Send and Ripley.

I object to the disregard for the Green Belt. It seems very cynical to alter the village boundaries and remove land from the Green Belt designation to facilitate development. It makes a mockery of Green Belt protection - Green Belt is vitally impotrant to protect our villages from becoming an urban sprawl and is even more important now with such pressures for development. The whole character of Send, Ripley and the local area would change irrevocably and we have a duty to protect our villages and the countryside from inappropriate and ill advised development. The Green Belt helps maintain a buffer between Guildford and Woking.

I object to the proposed huge development plans at the Wisley airfield site. Although it has been refused, it is subject to
appeal and still appears to be a very real possibility. Such a large scale development would have a devastating effect on the character and amenities of the local area and the traffic levels would dramatically increase. The A3 is already struggling to cope with traffic at a standstill on several days each week, and not just at peak times, with accidents occurring regularly. This large proposed development of 2,000 houses at Wisley Airfield along with 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the proposed 45 homes on the former nursery-site A42. This land is low lying and subject to flooding. Tannery lane is narrow and twisting and unsuitable for the increase in traffic that such a development would inevitably bring. Also the land opposite [former vineyard] has been cleared and fibre optic cabling installed - no doubt preparing for future development and so the flood gates would be opening. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the 40 houses and traveller pitches A44 at Winds Ridge and Send Hill - again a new addition to the local plan - not previously consulted on. It is a landfill site and its suitability is questionable and again Send Hill is a narrow, single track in places, country road which would be adversely affected by the increased traffic.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools and existing amenities will be unable to cope. 70% of the proposed 13,860 houses are targeted at the Green Belt close to the A3, which will destroy the open amenity of the borough and produce gridlock on the A3 and A247 and surrounding roads, which are at present already struggling to cope.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban are which should be targeted first for development before the open countryside and the Green Belt.

Would you please take into account these concerns and objections and write confirming that they have been duly noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/140  Respondent: 10551841 / N C and N O Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 Green Belt at Para 4.3.15 Taking the Send Business Park out of the Green Belt is cynical and just conveniently allows for further expansion/development at this location. It is effectively an old non-conforming user in a beautiful countryside on the picturesque Wey Navigation. Any additional business development in the future would impact adversely on traffic in Tannery Lane and is not suitable in the Green Bel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1533  Respondent: 10551841 / N C and N O Brown  Agent:
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<td>Policy A42 Clockbarn Nursery Tannery Lane. The proposal of a further 15 houses on what was already an unsuitable site on a narrow country lane in the Green Belt shows that the concerns of the many objectors have been ignored. Access and traffic problems in the Lane itself and onto the A247 will be exacerbated. The Green Belt is being further eroded and the nature of Send as a village would be changed. Flooding, which is already an issue would likely to be made worse. I am writing to formally lodge my objections to GBC's latest draft local plan. I have objected, as have a large number of others, on a number of grounds in the past bit I am appalled to see that not only have these legitimate concerns not been taken into account in the latest draft plan but indeed Send appears to have been earmarked to take addional housing provision. It is very cynical to remove areas previously designated Green Belt in and around Send to conveniently accommodate GBC's massive housing plans. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>Policy A43 Garlicks's Arch. Again, this proposal has taken no accout of the huge number of objections. There has been no evidence to show the need for the addition of 6 travelling showpeople plots. The proposed enormous development in Green Belt is completely inappropriate and would change the village beyong measure creating a new town. Such overdevelopment in beautiful and ancient woodland would create a conurbation joining Send and Ripley. Green Belt is surely meant to protect against such a thing. There are really worrying issues about the great impact on traffic levels that such development would make on the local roads which are already congested, particularly at peak times. Having lived in Send for 20+ years and locally in West Horsley for some 8 years prior to that, I have seen a rise in traffic and congestion problems on our local roads over this period. Such a large scale housing proposal can only cause traffic chaos. Again, flooding is likely to be an issue and the area is currently a flood zone 2 allocation. Moreover the land is contaminated by lead shot accumulated over 50 years. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<tr>
<td>Comment ID: pslp172/1535  Respondent: 10551841 / N C and N O Brown  Agent:</td>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</th>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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</table>
Policy A58 Land at Burnt Common. This policy was deleted from the 2014 draft because of objections and yet inexplicably has been reintroduced.

In addition, despite a decline in demand for industrial development, the word "minimum" has been changed to "maximum" which gives carte blanche for future expansion. Green Belt should not be eroded for such a purpose particularly when Slyfield and Guildford still have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares here in Send. All this will again impact badly on traffic problems on our local roads and spoil the nature of the Green Belt and our villages of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4442  Respondent: 10551937 / Anne Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4443 Respondent: 10551937 / Anne Davies Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river...
flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/4444</th>
<th>Respondent: 10551937 / Anne Davies</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2869  **Respondent:** 10551937 / Anne Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp17q/547  **Respondent:** 10551937 / Anne Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/339  Respondent: 10552033 / Erik Yngvesson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regards to the A21 policy: Land at Westborough allotments, I wholeheartedly support the preservation of the allotment for two main reasons:

1) The open green space is a precious commodity, and

2) Potential access to the site via Broadacres would be unsustainable from a traffic perspective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/235  Respondent: 10560417 / Charles Macher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO over development in the Horsleys. The villages cannot sustain 500+ houses and attendant vehicles. The infrastructure cannot cope with the extra traffic and pressure on local schools and doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/344  Respondent: 10560417 / Charles Macher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO development of Wisley Airfield. This site is not and never will be suitable for the proposed new town of 2,000+ houses and 4,000+ vehicles. A3 is already working at full capacity with tailbacks at peak times. The site falls between three junctions M25, Cobham and Ripley causing traffic chaos. No adequate public transport the two local railway stations already over subscribed. Combined with narrow lanes the whole area would be turned into a traffic disaster. Air pollution, no adequate infrastructure makes the whole plan a non starter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/733  Respondent: 10560417 / Charles Macher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the proposed alterations to the GREEN BELT. It acts as a buffer to urban scrawl. It provides much needed recreational use for people and important habitat for wildlife. It is a valuable and much cherished asset which must be preserved for present and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/241  Respondent: 10560513 / Jennifer Coyne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I OBJECT TO over development in the Horsleys. The villages cannot sustain 500+ houses and attendant vehicles. The infrastructure cannot cope with the extra traffic and pressure on local schools and doctors surgeries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/350  **Respondent:** 10560513 / Jennifer Coyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I OBJECT TO development of Wisley Airfield. This site is not and never will be suitable for the proposed new town of 2,000+ houses and 4,000+ vehicles. A3 is already working at full capacity with tailbacks at peak times. The site falls between three junctions M25, Cobham and Ripley causing traffic chaos. No adequate public transport the two local railway stations already over subscribed. Combined with narrow lanes the whole area would be turned into a traffic disaster. Air pollution, no adequate infrastructure makes the whole plan a non starter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/747  **Respondent:** 10560513 / Jennifer Coyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I OBJECT TO the proposed alterations to the GREEN BELT. It acts as a buffer to urban scrawl. It provides much needed recreational use for people and important habitat for wildlife. It is a valuable and much cherished asset which must be preserved for present and future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID:** PSLPA16/527  **Respondent:** 10560609 / G B Daintry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as "open spaces" there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3038  **Respondent:** 10560737 / Miriam Tarron  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---
I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3039  Respondent: 10560737 / Miriam Tarron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/307  Respondent: 10561953 / M Conisbee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

The Village infrastructure simple cannot take more people, school, doctors, roads are all under pressure now as things stand,
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful
countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is
currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single
track country road providing insufficient access to the site.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be
targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre
Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1263  Respondent: 10561953 / M Conisbee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at GARLICK’S Arch— Policy A43

BECAUSE THERE IS NO PROVEN DEMAND FOR PLOTS TRAVELLERS / SHOW PEOPLE , AND 400 HOMES
WILL CAUSE OVER DEVELOPMENT ,IT WILL JOIN RIPLEY AND SEND AND DEFEAT THE PURPOSE OF
GREEN BELT,AND ADD A HIGH VOLUME OF TRAFIC TO THE A3 AND THE MAIN ROAD THROUGH SEND
VILLAGE, THE SCHOOLS AND DOCTORS SURGERY IS FULL , YOU CANNOT GET AN APPOINTMENT AS
THING STAND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1262  Respondent: 10561953 / M Conisbee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Burnt Common —policy A58
NO NEED— FOR MORE INDUSTRIAL SITES IN SEND VILLAGE, ALREADY SLYFIELD HAVE EMPTY UNITS / SITES, WE REALLY DO NOT NEED THIS IN A GREEN BELT AREA THIS WILL ALSO ADD TO TRAFFIC GRID LOCK.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/305  Respondent: 10561953 / M Conisbee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt policy 2 parr; 4.3.15.

Send Business Park— has now been removed from the green belt I understand, this is shameful, this is along side the beautiful river Wey Navigation, this should be homes not unsightly industrial buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/1615  Respondent: 10562049 / Ian Cameron  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Inadequate notification and planning for Developments 43 and 43a

The developments on Land a Garlick’s Arch were not included in the Draft Local Plan 2014, and it is only in the Draft Local Plan 2016 that I first learnt of them. Therefore, I object because it is unfair to make such a major change to the Plan with so little prior notification, and allow such a short consultation period of only 6 weeks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3566  Respondent: 10562049 / Ian Cameron  Agent:
<table>
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Transport

Your Transport 2016 report states “Existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development, reducing quality of life, particularly in:... Send, particularly Potters Lane, ...”. Therefore, I object because all the proposed developments in Send (A42, A43, A44, and particularly A43a) with have a significant negative effect on the transport infrastructure, which your consultants say is already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3567  Respondent: 10562049 / Ian Cameron  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Sustainability

I object to all the proposed housing developments in Send (A42, A43, A44) because they will all promote the opposite of “encouraging sustainable forms of transport”, “conserving landscape character”, and “providing housing to meet local needs”, and most of the other Sustainability criteria. I object because, obviously as a resident, I can see for myself that local amenities at present are either inadequate or under strain, and therefore will not meet the required Sustainability criteria with the influx of another thousand or so people. The Sustainability report 2016 seems just to pay vague lip-service to GBC plans, rather than being properly fact-based, truthful, and pragmatic on these matters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
Please taking into account my objections to Developments in Send (A42, A43, A43a, A44) listed below, and draw all my objections to the attention of the Planning Inspector.

Green Belt

I object to the proposals to inset from the Green Belt the villages of Send, Send Marsh/Burnt Common, and Ripley, because (given the proposed developments in them, and the huge developments planned close by at Wisley and Gosden Hill Farm), the first three NPPF main guidelines on preserving the Green Belt are not being adequately observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/90  Respondent: 10562049 / Ian Cameron  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

IN GENERAL, I OBJECT TO DEVELOPMENTS AROUND SEND, TOGETHER: policies A42, A43, A58
I object to changes to these Policies in the Plan on the grounds:
1) Since 2014, GBC has repeatedly changed its mind on what is appropriate for Send, showing lack of co-ordinated strategy. Again now, it is relentlessly and unfairly targeting the area with developments, regardless of previous objections to these excessive plans.
2) The local “village” services, roads, transport, doctors, etc, barely cope as it is. But, under the Plan the population of Send will increase so much that I think that local services will be “unsustainable”; and that is against the fundamental principles of “proper” planning.
3) The Burnt Common area will become “traffic chaos” in peak hours, having 3 major new developments nearby: a huge new housing estate, industrial park, and new A3 slip-road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/935  Respondent: 10562049 / Ian Cameron  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the changes in this policy, because:

1) This development is far too large for the local area to cope with. It will effectively join villages of Send, Send Marsh, and Ripley, to form one contiguous built-up area; forming, within a short time, a new town effectively.

2) I object to space being allotted to accommodate Gypsies and/or Travelling Showpeople in this area. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/934  Respondent: 10562049 / Ian Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

IN PARTICULAR, POLICY A58 – Land at Burnt Common
I object to changes in this particular policy, because:
1) The strongly held view locally is that this development is unnecessary, there being no actual need more warehousing and factory space sited here. But, in particular, I object to its extent being randomly changed from a maximum of 7,000 sq m, to a minimum of 7,000 sq m, that is effectively making it limitless in terms of what can be crammed on to it.
2) The development will add to already severe peak-time traffic congestion.
3) If proposed developments to Burpham are also approved, there will be only a narrow strip (about 500m) of Green Belt separating Guildford/Burpham and Send/Ripley contiguous built-up areas. This will be an unacceptable erosion of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3493  Respondent: 10563457 / John Creasey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development at Clockbarn Nurseries of 45 houses as Tannery Lane is far too narrow and bendy to take a large amount of traffic. The marina will already increase the traffic on this road plus the 64 houses which have already been approved. Tannery lane/Send Road junction is already very busy and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3491  
Respondent: 10563457 / John Creasey  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposed development at Garlick's Arch of 400 houses as this was only included in the plan with only 2 weeks notice and without previous consultation and is not necessary for housing needs of the village or the borough. Also this site has a particular sensitivity as it is covered in ancient woodland with trees which date back to 16th century being endangered. The site is also frequently flooded.

I object to the proposed Industrial development at Garlick's Arch of 7,000 sq.m since a reduction of 80% in required employment floor space is shown in the latest Employment Land Needs Assessment 2015 (ELNA). Slyfield should be used if there is a need for 7,000 sq.m which has a 40ha site available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3495  
Respondent: 10563457 / John Creasey  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposed new interchange onto the A3 at Burnt Common as the A247 would be gridlocked all day and a disaster for Send.

I object as the Transport Evidence is Incomplete and unreliable to the proposed interchange onto the A3 at Burnt Common as Send would be used as a diversion to A3/M2S.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>I object to the development at Send Hill of 40 houses as this is close to an area of beautiful countryside and is in a Green Belt of high quality.</td>
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<td>I object to all the proposals as Send is a small village and no thought or planning seems to have been carried out as to infrastructure including the flooding which occurs in certain parts of the village, increased traffic, schools for the influx of children, Doctors surgery, Buses which do not pass the Doctors Surgery which covers Ripley, Clandon, Send and other local villages.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the green belt as Send separates Guildford and Woking. Is it necessary to remove ALL the green belt? Surely this not necessary. The Government's policy is to protect the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/709  Respondent: 10563777 / Hazel Creasey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that no thought has been given to infrastructure such as GP Surgery and schools. The A247 will become a solid traffic jam. Send needs to be bypassed if the new junction on the A3 goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1099  Respondent: 10563777 / Hazel Creasey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of new houses proposed at Garlicks Arch as this will add to the traffic through Send on the A247 which is already above tolerable limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1100  Respondent: 10563777 / Hazel Creasey  Agent:
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I OBJECT to the proposed new road junction as this will involve the A247 becoming the major route through Send between Woking and the A3. The houses on Send Road and part of Send Barns Lane are close to the road so pollution is a major issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposed two travellers's pitches on land west of Winds Ridge and Send Hill as this is a new proposal and has not been consulted upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the way in which Guildford Borough Council keep changing the proposed plan. In 2014 430 new houses were proposed in Send, which then was reduced to 185 and now it is up to 485 with a massive new road junction. These changes require a full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I understood the Government policy was to protect the green belt which you seem to ignore. The land around Send already floods in winter so where will the water go when it is concreted over? Probably to flood the existing houses.

Send is an ancient village mentioned in the Domesday Book so building on the greenbelt will destroy the nature of the village.

Guildford and Slyfield have empty sites and industrial units so this should be used.

The 2017 Employment Need Assessment shows a reduction in demand for industrial land for the whole Borough.

This will generate a huge increase in traffic and cause gridlock on the local roads. The green belt is precious and should be protected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I OBJECT TO POLICY A42 because you have increased the number of houses to be built from 45 to 60, an increase of 33%. There were a lot of objections to the original number so why increase it? I feel this increase is unacceptable and will lead to a considerable increase in traffic on an already extremely busy road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: pslp172/1219  Respondent: 10563777 / Hazel Creasey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY A43 change at Garlicks Arch because of the number of homes to be built despite previous objections. 6 plots for travelling showpeople is totally unnecessary as there is no proven demand. It will change the nature of Send and Ripley as two separate villages and will generate excessive amounts of traffic.

It is a flood risk area and is contaminated by lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1220  Respondent: 10563777 / Hazel Creasey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY A58 because it was deleted from the 2014 draft due to the number of objections and the word minimum has been changed from maximum, and since 2016 there has been a reduction in demand for industrial land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/300  Respondent: 10565569 / Sheila Mardle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<th>Comment ID: PSLPP16/897</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE LACK OF EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS. THE FACTS JUST DO NOT ADD UP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE VERY REAL LACK OF PROVISION FOR NEW SCHOOLS AND DOCTORS SURGERIES.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO ALL EROSION OF THE GREEN BELT. Our green belt is precious to the environment and especially I object to the removal of any villages from the green belt. My village of Send cannot sustain the development which would surely follow this action. We are a community with our own identity and do not wish to be swallowed up as an extension of WOKING.

There are several areas in our village which would be extremely vulnerable to development. Our school, doctors surgery and roads just cannot sustain any increase in residents.

I OBJECT TO THE VERY LATE INCLUSION OF LAND AT GARLICKS ARCH. I do not believe this important conservation site should be developed and cannot see the need for the extra 400 houses or the industrial units proposed for
the site. It is obvious to those of us who live in Send that the proposed 4-way interchange at Burnt Common would be a disaster for our village and Ripley and Clandon. I live on the A247 and already the road is at gridlock on many occasions. It would appear that our lives are to be severely blighted because of proposed development else where, ie Wisley and Burpham. No wonder we think not Send again!

The houses at Winds Ridge and Send Hill are another new site not consulted upon. Again more erosion of our green belt. Not Send again!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/895  **Respondent:** 10565569 / Sheila Mardle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to the disproportionate amount of development in one area of the borough yet again.

I OBJECT TO THE LIMITED CONSULTATION PERIOD.

I OBJECT TO LAST MINUTE INCLUSION OF NEW SITES. LESS THAN 2 WEEKS NOTICE!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/898  **Respondent:** 10565569 / Sheila Mardle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THIS ILL THOUGHT OUT PLAN FOR OUR AREA OF GUILDFORD BOROUGH.

I WISH MY OBJECTIONS TO BE ADDED TO THE MANY OTHERS OF CONCERNED RESIDENTS IN GUILDFORD AND ESPECIALLY IN SEND AND SURROUNDING VILLAGES AS WE ARE ONCE AGAIN PARTICULARLY AFFECTED BY THESE DRAFT PLAN PROPOSALS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2656</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change because the 33% increase in homes from 45 to 60 not only ignores the hundreds of objections made by local Send residents previously but will impact even more and worsen considerably on access and traffic problems in Tannery Lane and the junction with Send Road. As a Send Road resident I am only to aware of this fact. Also it will further erode the Green Belt in our village and worsen surface water flooding in the surrounding area. Send residents opinions seem to be totally disregarded in this latest increase of buildings.

I object to the Policy A43 change at Garlicks Arch because the objections previously made by local people in their thousands have been ignored causing over-development in Send due to the excessive number of homes. This will have a disastrous impact on our local schools and doctors ability to cope with the large increase in residents. The increase in traffic in the area will totally block many of our local roads. All local people are aware of these problems first hand on a daily basis. The need for Travelling show people plots is unsubstantiated in the area. Once again the Green belt will be eroded and the villages of Send and Ripley will be joined up. This ancient woodland is likely to frequent flooding and has existed since the reign of Elizabeth I surely it deserves to be preserved for the future.

I object to Policy A58 AT Burnt Common because its deletion from the 2014 draft due to the numerous objections and decline in demand for industrial land since the 2016 plan show there is no need for this sort of development especially in the middle of the Green Belt. This is further reinforced by the fact that Slyfield and Guildford have empty sites and industrial units. This is born out by the 2017 Employment Land needs showing a reduction in the demand for industrial land. Importantly this development is yet another factor in gridlocking our local roads and joining up our villages.

I object to the proposal to inset Send Business Park from the Green Belt because of its proximity to the Wey Navigation in a great countryside setting in open Green Belt and is totally inappropriate. This too will impact badly on vehicular access in both directions along Tannery Lane. ONE HAS TO QUESTION THE REASON FOR THIS APPLICATION BY THE OWNER OF SEND BUSINESS PARK.

In conclusion I a longstanding resident of Send Village (and a former Ripley resident) cannot comprehend why we have been targeted for even more disproportionate development once again. I THINK THE TRAFFIC AND POLLUTION IMPACT ON THE VILLAGE IS COMPLETELY UNACCEPTABLE TO US RESIDENTS.

We need our Green Belt especially as we know there are other alternatives for development in our borough.

Sheila Mardle

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10568769 / Steve Trowbridge</th>
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<td>In terms of housing demand, I do not believe that the rate of population growth in the Borough has been accurately modelled. Commentators have recently identified falling numbers of people leaving London for nearby towns and villages. Also until the terms of Brexit have been established I do not believe that anyone can accurately model or forecast demand as the key parameters of immigration/migration and economic demand are now unclear.</td>
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<td>I also think it is inappropriate to designate the Station Parade as a district centre – the shops, although extensive, are not able to cater for all needs, necessitating additional car journeys to Cobham or Guildford. There is only one bank for example, the main food shop is a “convenience store” not a small supermarket, there are no clothing shops other than charity shops and there is no hardware store.</td>
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Secondly I believe that the level of development proposed for the Horsleys will place already stretched local infrastructure under even greater pressure. I myself live in East Horsley and have been unable to get my children into the only primary school within the village. I was also unable to park at Horsley station last week as the car park was already full by 9.30am. This suggests that the local area does not have the vital infrastructure to support such a level of development, and has limited scope for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6536  Respondent: 10568769 / Steve Trowbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly I do not believe that it has been demonstrated that “exceptional circumstances” exist to remove the Horsleys from the Green Belt. Any decision needs to balanced against other opportunities and requirements within the Borough, and therefore also cannot proceed as a plan without fully explaining why demand cannot be satisfied elsewhere. The Council seems to be seeking approval for “all options”, not a short list.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6538  Respondent: 10568769 / Steve Trowbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[My particular concern relates to the excessive level of development proposed for East and West Horsley, collectively referred to as the “Horsleys” ...]

Whilst an argument could be made that some people will walk or cycle to the station following such a development, as a cyclist, it is already noticeable how poorly maintained the roads and pavements are in the Borough – the road in front of the Horsley shops and up to the station is a perfectly appropriate example of a dangerously potholed stretch of tarmac – cycling is therefore an unsafe option, especially when coupled with the poor local drainage and local flooding. Whilst an attempt has been made in some places in the Borough at marking out cycling lanes (A246, Ripley etc) , it appears that the Council feels that painting a white line is “job done”. No effort is then made to repair holes in those lanes, to clear rubbish (metal, glass), to remove overhanging vegetation or to fix collapsed manhole/inspection chamber covers. Likewise pavements, especially in Horsley, are either too narrow (pedestrians at risk from being struck by vehicles/wing mirrors/flying stones),
unpassable in wet weather (due to cars swamping the pavements with water) or are poorly maintained. Existing policy therefore seems orientated towards cars and, as mentioned earlier, the infrastructure will not be able to cope with this development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3406  **Respondent:** 10568897 / Susan Walsh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Ref: Draft Local Plan – Objection to proposed development on site A22

140 homes and a care home on land north of Keens Lane

Further to your draft plans outlining the development of the above area please note my objection on several counts.

Before I list them I am at a loss to understand why Guildford, which is currently a moderate sized market town, would need expansion at the levels you propose. I do understand that some additional housing needs to be provided although I do not agree that in Guildford it could ever be described as “affordable” but the proposals you are making are vast and will change the dynamics of this presently lovely place to live into another blot on the landscape and a characterless place to live.

Regarding the proposals for a development of 140 homes and a care home, (Site A22) my objections are as follows:

The area north of Keens Lane is Green Belt and should be retained and not built on. It is the councils responsibility to protect this land and it should only re reclaimed for house building in extreme situations which your current plan to build so many new homes cannot be considered extreme.

1. The current traffic situation for the local residents is becoming increasingly difficulty with Gravetts Lane and Keens Park Road often being used as a rat run. Even if the road is widened this will not accommodate the huge increase in traffic created by so many new homes trying to filter onto the Worplesdon and Aldershot Roads. The roads in this area are already heavily congested and it beggars belief why you are so intent on making things so much worse, Guildford does not have the infrastructure this side of the town for this huge development.

1. The proposed development site is close to a Site of Special Scientific, Whitmoor Common in particular. Your plan is very alarming and would be certain to have a damaging effect on ecology and wildlife no matter what was put in place to try to avoid this. The green space between Guildford and Worplesdon should be maintained to allow a green corridor for flora and fauna.

I sincerely hope my objections will be recorded and taken into account when your final plans are submitted, it is very important to listen to the residents objections and concerns.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>Supportive of public tenure pitches as it is easier and provides a level of control.</td>
<td>Support that GBC allocate and manage the pitches as it ensures fairness and tenure security. Support inclusion of garden provision and softer landscaping.</td>
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<td>Utility blocks are necessary as no one will want to live somewhere without a utility block and the site will end up being a transit site No facilities of space within a mobile home for washing facilities. If a family could afford a unit with wash facilities, it is likely they would be on a private site anyway.</td>
<td>Strongly support the need for inclusion and breaking down of barriers, particularly for the children.</td>
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<td>Agree with softer landscaping to resist isolation.</td>
<td>If outhouses or utility blocks are not including, outbuildings will be built anyway.</td>
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<td>Support phasing of the sites .</td>
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Good to see more secondary schools, particularly of smaller sizes.

Support park and ride opportunities. Would like to see more community facilities in local areas as currently cannot do anything without a car.

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<th>Comment ID: PSLPS16/490</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Strongly support the need for inclusion and breaking down of barriers, particularly for the children.

Agree with softer landscaping to resist isolation.

If outhouses or utility blocks are not including, outbuildings will be built anyway.

Support phasing of the sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Agree with softer landscaping to resist isolation.

If outhouses or utility blocks are not including, outbuildings will be built anyway.

Support phasing of the sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/494  **Respondent:** 10569473 / Laura Gold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Good to see more secondary schools, particularly of smaller sizes.

Support park and ride opportunities. Would like to see more community facilities in local areas as currently cannot do anything without a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/481  **Respondent:** 10569473 / Laura Gold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Concerns over the tenure of Travelling Showpeople Plots and any lack of uptake on purchase will be due to lack of funds.

Support that the plan is trying to support all members of the Travelling community by providing pitches and plots. The plan shows a huge step forward and it is great to hear of integration of travellers without just securing provision on poor quality land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/492  **Respondent:** 10569473 / Laura Gold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A48

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fully supportive of this policy. The local community has been very supportive in moving this forward. Feel integrated with the local village and the children get on well with local families too. There is a high need for traveller pitches in the area and these 6 pitches will ease the strain in the local area. It will ensure sites are less cramped and will level out provision.

It will provide security and space for children as well as day to day facilities for all. Keen to progress this as quickly as possible to ensure that area can be tidied up and look more respectable. Happy with the split of pitches across 2 areas of land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1092  **Respondent:** 10569473 / Laura Gold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support the content of H1 and appreciate members of the travelling community being considered and included as part of the Local Plan. It is a good idea to bring pitches in a phased way with big developments and sets a good example for other boroughs. Support inclusive communities, such as the Send site, to break down the ‘fear factor’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/483  Respondent: 10569537 / Kelly King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Good to see more secondary schools, particularly of smaller sizes.

Support park and ride opportunities. Would like to see more community facilities in local areas as currently cannot do anything without a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/486  Respondent: 10569537 / Kelly King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Support phasing of the sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/484  Respondent: 10569537 / Kelly King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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It will provide security and space for children as well as day to day facilities for all. Keen to progress this as quickly as possible to ensure that area can be tidied up and look more respectable. Happy with the split of pitches across 2 areas of land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1093  Respondent: 10569537 / Kelly King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support the content of H1 and appreciate members of the travelling community being considered and included as part of the Local Plan. It is a good idea to bring pitches in a phased way with big developments and sets a good example for other boroughs. Support inclusive communities, such as the Send site, to break down the ‘fear factor’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/329  Respondent: 10569697 / Shaun Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick's Arch

I hereby wish to lodge my official objection to the proposed development of 43.3 ha of land at Garlick’s Arch, Burnt Common.

This proposal was included a mere 2 weeks before submission to the full Council for approval at the end of June.

NO consultation with the general public, local people or anyone who uses this land (including myself) was entered into which is a terrible indication of the high-handed manner in which this proposed destruction of protected greenbelt land has been formulated.
This greenbelt land, containing ancient woodland, is in regular, sustainable use bringing enjoyment to many local people and should not have even been considered for development as it is protected by the NPPF in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2923  Respondent: 10569953 / Darius Hughes  Agent: 10569953 / Darius Hughes

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to state my objections towards the Guildford Borough Council Local Plan 2016. I think that it will ruin our beautiful countryside, and I am deeply concerned about the Local Plan 2016.

Loss of Green Belt

I object to the removal of the Horsleys from the Green Belt because I do not want building on protected countryside.

Overloaded medical facilities

I object to the building of more houses in the area which will put strain on the already overloaded medical practice in East Horsley.

Schools are full

I object to the building of more houses in the area because The Raleigh and The Howard of Effingham schools are already full.

Drainage

I object to more houses being built because the drainage system in the villages is inadequate. There are floods on the roads which prevent me walking to the station sometimes.

Roads

I object to more houses being built because the roads are too busy and this will make them busier.

Car parks

I object to having more cars in the villages because there is limited car parking space already and more cars will mean more car parking will be needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/948  Respondent: 10569953 / Darius Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the proposed Guildford Local Plan. I disagree with the premise that we require so many new homes, that we should build them to a large extent of green belt land, that we should remove some of our beautiful Surrey countryside villages from the green belt and that the homes that we do build are not adequately provided with infrastructure and services.

Specifically I would like to object on the following:

Policy 2: Greenbelt and countryside
I strongly oppose any changes to the boundaries of the green belt and the removal of West and East Horsley from the green belt by insetting and extending the 2003 local plan settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/949  Respondent: 10569953 / Darius Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough wide strategy
I totally oppose the calculation that 13,800 new homes will be needed in the borough over the planning period the number is far too high and unsustainable in the villages and countryside.

I would ask the council to reconsider the local plan reducing the number of homes, keeping the current boundaries of the greenbelt and where building is needed providing adequate infrastructure and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1633  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I am writing to strongly object to the proposed Guildford Local Plan. I disagree with the premise that we require so many new homes, that we should build them to a large extent of green belt land, that we should remove some of our beautiful Surrey countryside villages from the green belt and that the homes that we do build are not adequately provided with infrastructure and services.

Specifically I would like to object on the following:

Policy 2: Greenbelt and countryside
I strongly oppose any changes to the boundaries of the green belt and the removal of West and East Horsley from the green belt by insetting and extending the 2003 local plan settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green The way student's economic need and affordability are calculated inflates the housing need. I believe that the SHMA of 2015 is highly questionable as the number of foreign students has been wrongly used to inflate the housing need. The figure of 13,860 houses is excessive, as a population increase would only need about 8000 homes at an average of 2.5 persons per house. About half of these houses could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1632  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlicks Arch, Clockbarn Nurseries and Send Hill because it is not justified by any "exceptional circumstances" and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3138  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the large proposed developments at Site 'A35') 2,000 houses at former Wisley Airfield (already rejected by GBC), Site A25 - 2,000 houses at Gosden Hill Farm and the 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3136  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. It is also subject to The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3132  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 week's notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

Site A43 I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015(ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40 hectare site available

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3134  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Site A43 I object to the development at Garlick's Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3135  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43a - I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the A247 to Old Woking a would be gridlocked all day. There are schools, shops and a bus route along this already congested village road. In the other direction the A247 towards Newlands Corner - the section between the Onslow Arms and Clandon Park is very narrow with bends and there is only just room for cars to pass each other but lorries and buses have to mount the footway.

Site A43a - I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. This interchange will cause dangerous queueing on the A3 in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3137  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Site A44 - I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6829  Respondent: 10570049 / Jenny Peachey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6815  Respondent: 10570049 / Jenny Peachey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6816  Respondent: 10570049 / Jenny Peachey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

2. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6833  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads, including the A247 which are all already at 100% capacity.

GBC has completely failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and Green Belt. GBC have also failed to include the Town Centre Masterplan 2015 within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/70  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Local Plan proposes an increase of 500 homes in Send, that is nearly 30%. (40 at Send Hill, 60 at Tannery Lane and 400 at Garlicks Arch).

In addition, within a few kilometres there are proposals for another 4500 homes (2000 at Wisley and 1500 at Gosden Hill Farm).

Add to this the proposal to build 10 hectares of industrial/warehousing at Burnt Common.

Add to this the proposal to build north and southbound interchanges onto the A3 trunk road at Burnt Common.

This is not sustainable for such a location as Send and Ripley as there is not the capacity to upgrade the infrastructure to accommodate such increases.

Existing residents, roads and facilities will overwhelmed.

The consultation of Guildford's Local Plan in 2016 produced over 33,000 comments and one third of these came from Send.

Send appears to have been allocated additional development in this latest submission despite a reduction of the overall housing numbers in the borough, plus an increase of industrial/warehousing development.

Guildford Borough Council have requested a consultation and comments from local residents. They must take on board the comments and modify the submission accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/604 **Respondent:** 10570049 / Jenny Peachey **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 - I object to building 45 houses at Clockbarn because of inadequate access and traffic. Tannery Lane is far too narrow and bendy to take any more traffic. It is also subject to flooding. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/622 **Respondent:** 10570049 / Jenny Peachey **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 - I object to building 45 houses at Clockbarn because of inadequate access and traffic. Tannery Lane is far too narrow and bendy to take any more traffic. It is also subject to flooding. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42. Clockbarn Nursery, Tannery Lane, Send.

Increase from 45 homes (previously) to 60 homes.

This is a 33% increase in a small location, which is excessive and ignores hundreds of previous objections by local people.

It will make worse the traffic problems in the narrow and winding Tannery Lane. There has already been a successful application for 64 houses at the Marina further down Tannery Lane and another application is pending to build houses on the garage site on the corner.

The junction with Tannery Lane and the A247 Send Road is notoriously difficult to negotiate. The bad surface water flooding in the Lane will become worse.

It will adversely affect the open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/625  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43. Land at Garlick's Arch, Send Marsh, Send

Now 400 homes and 6 Travelling Showpeople plots.

This ignores thousands of objections from local people and there is no proven demand for Travelling Showpeople plots in this location.

There are no 'exceptional circumstances' to remove this from permanent Green Belt and it will cause over development of Send Village.

It will remove the green break of ancient woodland between Send and Ripley. The site is flood zone 2 allocation and frequently floods.

Excessive traffic will be generated and block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** pslp172/603  **Respondent:** 10570049 / Jenny Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Site A44 - I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/628  **Respondent:** 10570049 / Jenny Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Policy A58. Land at Burnt Common, London Road, Send

Changed from ‘maximum’ 7000 sq m to ‘minimum’ 7000 sq m of industrial or warehousing. This is not justified as there has been a decline in requirement for industrial land.

There is no need to build industrial/warehouse development on Green Belt when Slyfield and Guildford still have empty sites.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares of industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The vans and heavy goods vehicles will create traffic gridlock in the villages of Send and Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

**Comment ID:** pslp171/72  **Respondent:** 10570049 / Jenny Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**()

I object to Policy 2 at paragraph 4.3.15.

Send Business Park now taken out of the Green Belt altogether.

It is an old non-conforming user in an area of outstanding countryside adjacent to the Wey navigation.

There is highly restricted vehicular access along this narrow winding lane.

This location is totally unsuitable for further expansion/development and it will detract from the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/8245  **Respondent:** 10570593 / Mole Valley Liberal Democrats (Paul Kennedy)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**()

Guildford Borough Council: draft local plan (6 June 2016)

I write as Liberal Democrat Parliamentary Spokesperson for the five Guildford Borough wards in Mole Valley Constituency – and a resident of nearby Bookham - to express my strong support for the many hundreds of objections you have received to the Council’s latest draft local plan from the East of the Borough.

I urge you to reflect carefully on both the volume and the compelling quality of those objections, especially those from local parish councils, residents’ associations and other responsible individuals and groups.
In my view there is no justification for the disproportionate housing burden being proposed for this part of the Borough; the disregard for the lack of infrastructure, the impact on already congested local roads and the carefully considered neighbourhood plans that have been or are being developed by local residents; the proposed removal of so many rural villages from the Green Belt; or the repeated insistence on retaining rejected development sites such as the former Wisley Airfield.

It is disappointing that the divided and dysfunctional Conservative group which controls Guildford Borough Council and their local MPs still appear to be incapable of working with Government and local residents, businesses and other organisations to produce and agree a sensible, balanced, proportionate and sustainable local plan for the Borough. Please try harder.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/470</th>
<th>Respondent: 10570785 / Philip Coleman</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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</tbody>
</table>

The plan is sound and well balanced. It considers the needs of the borough as a whole and not just the (vocal) interests of property developers and home owners masquerading as concern for the green belt. I strongly support it and in my view it cannot be implemented quickly enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4403</th>
<th>Respondent: 10570977 / Laura Richards</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tr>
</tbody>
</table>
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4405  Respondent: 10570977 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick's Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4406  Respondent: 10570977 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2832  Respondent: 10570977 / Laura Richards  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/535  Respondent: 10570977 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/298  Respondent: 10579137 / Julie Ottey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the local plan. On the grounds that the Green Belt should be protected and should not be built on. Villages should not be taken out of the Green Belt. Seeking to have development in a protected area, is in breach of manifesto commitments.

There will not be provision for affordable housing, with priority for local people. Once our beautiful countryside is destroyed, there can be no turning back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2240  Respondent: 10579233 / Roger Hawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The increase in housing proposed, may be out of date due to the recent decision of the government to leave the European Union. This will have a knock on effect on the green belt and the effect of traffic and infrastructure. All these are very bad in this crowded area of South West Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2188  Respondent: 10580385 / Brenda Aldred  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A35 Land at former Wisley Airfield

Comment: I have objected before to this development as I consider this proposed development to be a contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley and its infrastructure. It will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7. SITES POLICIES

A36 Thatchers Hotel

Comment: It is appreciated that this site lends itself to housing, but the Plan for 48 houses and apartments is a density of 37 dwellings per hectare which I consider far too high as the average housing density in East Horsley is 8.1 dwellings per hectare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4. ECONOMY POLICIES

POLICY E2: Location for new employment floorspace

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status (within 500 meters of a public transport interchange).

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. There is a strong case for EJS deserving PTI status in the same way as Horsley Station.

1. Both stations are within the Green
2. EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.
3. EJS is not "isolated" or "away from the village centre."

Effingham Junction area of East Horsley is a thriving community with a significant population and also a number of businesses. Including a General Store, car sales and car repair business, Dentist and Chiropractic clinic, Garden Centre, Beautician, Yoga venue, Interior Design business and a Village Hall used by keepfit classes and other groups.

The Local Plan's economy policies affecting this area must protect this site creating conditions for growth and job creation.

Also EJS is clearly a "public transport interchange". This is for the following reasons:

1. EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, many London bound passengers will change trains here.
2. EJS also serves residents of Effingham and Little Bookham for whom EJS is closer than Bookham Station.
3. EJS also serves those who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites.
4. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan.

I therefore OBJECT to Policy E2 where it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. INFRASTRUCTURE POLICIES

Policies I1, I2 & I3

I consider that there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the proposed housing policy will exacerbate this problem.

1. Roads in the East Horsley Parish are mostly lanes in poor condition with many narrow and winding with pinch points, this, along with poor pavements and lack of streetlighting makes the roads unsuitable for more traffic that increased housing will bring.
2. The schools are oversubscribed.
3. The Medical Centre at full
4. Although it is stated that the maintenance of adequate infrastructure to meet growing needs is the responsibility of the relevant infrastructure provider this is not always clear who that is - developers, local councils or utility providers. There are no proposals in respect of all the existing problems with for example roads, pavements,
drainage, and schools. Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 - 15 of the Plan.

Local primary schooling is also a very pertinent issue and no proposals are made in the Draft Local Plan to provide for any more schooling in the Horsley's.

I therefore OBJECT to the infrastructure proposals as they do not meet the stated objective of providing infrastructure to support the proposed developments within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. PROTECTING POLICIES

Policy P2: Green Belt

a) Paragraph 3.13: Proposal to inset East Horsley from the Green Belt

I OBJECT to East Horsley being removed from Green Belt as it has preserved the rural character and openness of this village and surrounding area.

East Horsley is a rural village and its Green Belt status has been a key factor in preserving its character yet being in the Green Belt has not impeded its housing build. The village parish also contributes greatly to the openness of the Green Belt being at least a third woodland with large gardens and low-density housing.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

I OBJECT to the proposal to move the settlement boundaries along the eastern boundaries of Ockham Road North and Lollesworth Road when the only justification for this change could be to bring a large field within the settlement area in order to provide more housing land. Under NPPF rules this is not a sufficient justification for changing a Green Belt boundary.

I OBJECT to the proposal to remove Kingston Meadow from the Green Belt. Kingston Meadow is the main public recreational space of East Horsley and West Horsley, comprising various sports facilities and playing fields. If any changes are to be made at all it should be designated as a SANG in order to protect this land from any irresponsible planning or development. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances' in order to protect this land from

c) Paragraph 3.17: Proposal to remove Wisley Airfield from the Green Belt
I OBJECT to the proposal to remove Wisley Airfield from the Green Belt in order to fulfil the estimated housing need, building a small town of this size to meet Housing Need on Green Belt is not an exceptional circumstance. It will have a major adverse impact on infrastructure across a widespread area, including East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/4681   Respondent: 10580385 / Brenda Aldred   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. STRATEGIC POLICIES

Policy S2 - Borough wide Strategy

This building programme, represents a net increase of 25% in the housing stock of Guildford Borough, a high rate of increase when the Office of National Statistics ("ONS") are projecting a population increase of 15% for Guildford Borough over this same period. It is clear that GBC is promoting an economic expansion which appears to underpin the housing policies in the Local Plan.

I OBJECT to Policy S2 as I do not think any economic growth promotion should be used in the projections for housing growth especially in the light of the recent outcome of the Referendum on the EU membership.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1944   Respondent: 10581825 / A D Sussex   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT that Send is being asked to take a disproportionate number of the now houses that we need in the Borough. Rather than reducing the numbers put upon Send in the Plan, THE 2017 PLAN INCREASES THE NUMBER STEEP FURTHER.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** pslp172/1951  **Respondent:** 10581825 / A D Sussex  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LAND AT CLOCKBARN NURSERY, TANNERY LANE, POLICYA42A.
I OBJECT to the proposed change of use because;
  o It totally ignores all previous objections when the proposal was for 45 houses and now proposes 60.
  o Access to Tannery Lane is very restricted from both ends and could not cope with all the traffic this development would generate.
  o It is out of keeping with the open country feel of this area and is what the Green Belt is all about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1954  **Respondent:** 10581825 / A D Sussex  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LAND AT BURNT COMMON, LONDON ROAD, POLICY A58.
I OBJECT to this Policy because;
  • I must point out that it was deleted from the 2014 Plan because of all the objections and should be deleted again from the 2017 Plan
  • As I've already said (quoting Sir Paul Beresford) Guildford Borough has empty sites available for industrial use, Slyfield is one example. The Green Belt is not the place for it.
  o It would further aggravate gridlock experienced, quite frequently at Burnt Common and with the A3 intersection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GREEN BELT, POLICY 2 AT PARAGRAPH 4.3.15
The Policy proposes taking Send Business Park out of the Green Belt.
I OBJECT to this policy to inset the Send Business Park from the Green Belt because;
• It is an old non-conforming user in an area of great natural beauty on the Wey Navigation Canal, which the buildings once served and have historical significance.
• Access is highly restricted in Tannery Lane. (See above comments on Clockbarn Nursery). Further development would be out of place in open countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Re: Garlick’s Arch Site
I was horrified to learn just days ago that an amendment had been added to the Guildford Local Plan proposing a major new housing and industrial development between Sendmarsh Road and Burnt Common.

1. I object to the fact that this proposed new development appears to have been sneaked in through the back door just a few weeks after local residents had been notified of a significant reduction in planned new housing for Send. There has been no consultation with residents, and the Council’s Executive agreed the amendment fewer than five hours after it was submitted.

2. I object to the impact of such a development on air pollution, which will be significant, particularly with an inevitable increase in HGVs accessing and leaving the proposed industrial units. This will especially affect those people living on the Maple Road estate, where the land is much lower-lying than the Portsmouth Road, which runs along the back of these houses.

3. I object to this development because the infrastructure of the village simply cannot support it: Traffic joining the Portsmouth Road from both Sendmarsh Road and Broadmead Road is already extremely heavy during morning and evening rush hours, causing significant tailbacks through the village. There will also be a knock on effect from the increased traffic through Ripley, and on to the A3 at Burnt Common.

4. I object because of the already shocking quality of local roads – Sendmarsh Road and Polesden Lane especially have so many potholes that drivers are often forced to drive on the wrong side of the road, and there is a significant danger to cyclists. This will only worsen with the increase in traffic.
5. I object because there had already been sufficient planned expansion to the Slyfield Industrial estate in the form of light industry and warehousing, but I understand that this planned development has been withdrawn from the local plan, even though Slyfield is already used for this purpose and offers a much more appropriate site than what is being proposed.

6. I object to the inevitable increased pressure on local schools and medical facilities. The Villages Medical Practice is currently operating at full capacity, and all the doctors working there are concerned that they simply cannot provide sufficient medical care for the number of patients on their books. The Royal Surrey County Hospital is also at breaking point – not only is the amount of time it takes to be given an appointment after a referral unacceptable, but waiting times in A & E are horrendous. I have been admitted to the hospital three times this year as an emergency case, with waiting times before being transferred to the ward varying from eight to fourteen hours, even though government guidelines state that all cases should be seen within four hours. On the last occasion I was there for over five hours before even being assessed by a doctor, despite being 86 years old and in terrible pain.

A further 400 houses on top of the 185 already going ahead will put appalling pressure on the local infrastructure, and the planned industrial development – apart from being totally out of keeping with the area – will have a very negative impact on the local environment. I therefore object in the strongest possible terms and implore you to reconsider these ill-thought out proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

1. This development was removed from the 2014 draft as a result of the number of objections, and yet it has now been resurrected even though the demand for industrial land has actually decreased since then.
2. The new allocation for a minimum of 7,000 sqm of industrial land replaces the previous maximum. What has changed since 2016 to warrant an increase in this type of development?

Indeed, given that there are still empty industrial units at Slyfield Green and in Guildford, surely there is an argument for a reduction in Send?

1. As above, the effects on the village infrastructure, specifically the increase of traffic on small surrounding roads, will be significant.

Along with my fellow residents I beg you to reconsider the impact that this Local Plan will have on the village, and make changes accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/414  Respondent: 10585825 / Mark Tordoff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We urgently need better access between the Slyfield / Jacobs Well / Burpham area of Guildford and the A3.

Currently we have good access onto the A3 northbound, and off the A3 southbound. But we have no access whatsoever onto the A3 southbound, or off the A3 northbound. This already creates significant extra traffic going through and round Guildford, and the proposed new development at Slyfield is going to make this problem significantly worse.

I personally live in Jacobs Well Road, and I work in Farnham. So every morning I have to drive all round Guildford (Clay Lane, Salt Box Road, Worplesdon Road) in order to get onto the A3 southbound at the Wooden Bridge Roundabout. Then in the evening I have to do the exact same thing in reverse order, getting off the A3 northbound at the Wooden Bridge roundabout, then driving along Worplesdon Road, Salt Box Road, and Clay Lane. Surely it would make much more sense to avoid all this extra traffic through Guildford by providing improved access onto and off the A3 at the Burpham interchange.
We also need much better access onto Clay Lane at the northern end of Jacobs Well Road. Turning right out of Jacobs Well Road into Clay Lane is EXTREMELEY dangerous, and there are regular accidents at this junction. I think there really should be either a roundabout or traffic lights installed at this junction, before somebody gets killed in a fatal car crash.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1935  Respondent: 10587585 / D M Lavender  Agent: MGA (Michael Gilfrin)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Fairlands

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am instructed by my client, Mrs D M Lavender, the owner and occupier of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] to submit representations on her behalf regarding specific proposals contained in the local plan that impact upon her property. Representations have previously been submitted on her behalf in response to the Council’s SHLAA consultation, the consultation response indicating that the land comprising the residential curtilage to No.24 is available and suitable for future residential development. A copy of the submitted SHLAA plan identifying the site is attached hereto.

Mrs Lavender fully supports the Council's proposals to include Fairlands as one of 14 villages to be excluded from the Green Belt with a defined settlement area boundary, as shown on the Fairlands Plan comprising part of Appendix F, extending along the west side of the Aldershot Road, to include the entire garden area to No.24 within the settlement area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: D M Lavender.pdf (29 KB)

Comment ID: SQLP16/252  Respondent: 10589025 / John Kershaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
I believe the new plan has listened and acted on the previous comments made by myself and others but it is missing some critical points around traffic flow and car parking.

Traffic flow: The Guildford area is already a traffic black spot. The proposal to build on brown field sites in town is excellent but the road network cannot cope now never mind when the building is complete. I see improvements to the A3 junctions are proposed but what about once you are in Guildford? There needs to be another bridge over the river Wey. The access and exit from the railway station, the gyratory near the station, the end of Woodbridge Road (near Curry's/PC World, in/out of Ladymead, Stoke Road/Woking Road junction, North Street/Friary (especially once in the 1 way system) and Epsom Road coming into Merrow. There are others but this list shows an overall transport strategy needs to be developed.

Parking: The development of Park and Ride is good but not on it's own. A series of multi storey car parks on the edge of town needs building. All houses/flats built should have a minimum of 2 car parking spaces each AND further visitor spots. Any attempt to build without sufficient parking will result in a grid locked town resembling a car park.

Please go back to the drawing board and formulate a joined up transport plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1680  Respondent: 10615137 / Nav Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like more transparency on housing demand. From what I understand, the calculation has not been shared and seems disproportionately high versus the national estimates for population growth for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7101  Respondent: 10615137 / Nav Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Finally, I oppose the **encroachment into the Green Belt**, which is a green barrier to London, straddling the M25. If village change to town and significant chunks of green belt are built upon, these hamlets become an extension of suburbia.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On a specific point, classifying East Horsley’s **Station Parade as a Rural District Centre** is bizarre. Friends in Effingham use their local rural centre or head to Cobham – they don’t come to Horsley. Merrow or Guildford is used by those in Clandon. Ripley, which is seen as a local centre, has more retail and commercial space. West Horsley is not an obvious development zone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan suggests creating **affordable homes**. I’ve not seen any evidence on how this will be managed and struggle to understand how it would work, economically and commercially. Affordable homes will most likely be taken by people moving into the area, mostly likely from London. The expectation that this enables local people to downsize or move is wishful thinking. In addition, I hope there is legislation to prevent the character of the village being transformed by housing blocks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I will focus on both The Plan in general and the specific issues in my immediate area (East and West Horsley). For context, I moved to the area in 2010 from Brixton in London specifically because I valued the character of the area in which to raise my children; a quiet ‘village life’, low density, community, relative safety, green space.

Even without The Plan, the local area is relentlessly changing as the demographic is changing from older couples to young families (mostly moving from London), who are renovating and expanding current housing stock. The shift is already straining the visible and underlying infrastructure;

• filling the schools – there is a lack of state primary school places in the village, pushing people to private schools that are near capacity too
• straining the medical services
• overcrowding the trains – there has been a dramatic increase in the number of commuters; 4 years ago people would need to stand from Surbiton, 2 years ago Claygate, now it’s as early as Cobham
• increasing traffic on disintegrating roads that can’t be expanded or have footpaths added,
• water and drainage at capacity.

The Plan appears to focus on committing to an unsustainable increase in housing, while largely ignoring making the magnitude of commitments required for Sustainable Development. Unlike housing, where there is direct revenue from selling the property, infrastructure projects are notoriously hard to fund and usually take a long time to deliver

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7100  Respondent: 10615137 / Nav Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am not anti-development. I support the evolutionary infrastructure changes, such as site A41 allowing the relocation and expansion of the Raleigh School, which would come with increased housing. I support the equivalent in Effingham for the Howard School. Overall, I would also support more radical developments, such as the Wisley site for 2000 homes on a brownfield site. However, only if this comes with a binding commitment to infrastructure development, not just for the site, but for the surrounding areas – such as increased rail and bus services to allow the volume of people into commute. I suspect it will extend urban London out beyond the M25 and catalyse detrimental changes in the future, but it is probably the lesser evil to changing multiple villages around the green belt.

I appeal to the planning team to reconsider the approach, adjusting the increase in housing to where the impact is lessened (probably with lowest net infrastructure development cost), or to put a blanket percentage increase on all areas (which will probably come at a higher net infrastructure development cost).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7103  Respondent: 10615137 / Nav Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am absolutely opposed to insetting to remove West Horsley and East Horsley from the Green Belt. I’ve seen no evidence of the unpreventable, exceptional circumstances that dictate land previously protected by national legislation and areas of outstanding natural beauty, should not continue to be protected.

What is the justification for extending the boundaries of the village settlement areas, other than subversively allocating more area away from the green belt and towards development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7095  Respondent: 10615137 / Nav Nair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed to the Guildford Borough Proposed Submission Local Plan: Strategies and Sites 2016 (The Plan) in its current form because it;

• has a disproportionate impact on the villages,
• does not respect the character and density of the housing in the area,
• does not guarantee the creation of supporting infrastructure,

while encroaching the Surrey Hills Green Belt which is a national rather than a purely local asset

The disproportionate impact on the villages seems ludicrous. An 11% increase in housing in Guildford, versus a 35% increase in West Horsley. An increase in the population in large towns will have a lesser impact on the character of the area and the density of the housing, as well as having an advantage of having a better foundation of infrastructure. The reason for everyone I know to move to the villages, was the appeal of a ‘village’ life. Making them into suburbs and towns,
destroys the character and eliminates that appeal. A simple look at the Horsley Development Sites map shows the magnitude of impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1087  Respondent: 10615137 / Nav Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

So in summary, I am opposed to The Plan for the above reasons, with an overriding and saddening conclusion that the proposed growth in housing is not only bad for current residents, but for those that would move in too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3113  Respondent: 10616193 / Kate Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3114  Respondent: 10616193 / Kate Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a, the on and off ramp at Burn Common

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3115  Respondent: 10616193 / Kate Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A57 The Paddocks travelling pitches

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6756  Respondent: 10616193 / Kate Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of any villages from the Green Belt and over development of any Green Belt areas in Surrey

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6757  Respondent: 10616193 / Kate Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the assumption that housing is needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/640</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sad event of all these proposed dwellings will result in the villages merging to such an extent that they will lose their individuality as there will be no boundaries evident. Can I ask why all of these proposals have to be within this small area. Why not other surrounding villages like Worplesdon, Farnham, Godalming etc?

I do hope some of these fears, which I know are shared by many, get listened to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Whilst promising schools to be built accordingly I fear the possibility of approx. 20,000 new pupils even the proposed new schools will not manage.

4. The local surgeries are full to bursting with patients now, along with hospital beds. How can this problem warrant the proposed figure of new dwellings?

912
5. The small country roads in and around the villages are in a state of poor repair. I have read the proposals and there seems inadequate provision for the likely hood of 40,000 more vehicles traveling these small rural lanes. The current infrastructure will not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/637  Respondent: 10616225 / Gloria Shoesmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of my village of Ripley, Surrey all of my almost 70 years I feel I must object most strongly to the proposed plans in and around this village.

1. To give permission to build on Green Belt land will end in a downward spiral of respect for this precious ruling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/638  Respondent: 10616225 / Gloria Shoesmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. To allow the proposed number of dwellings, 14,000, within the villages of Ripley, Send, Clandon and Ockham is a frightening prospect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/217  Respondent: 10616225 / Gloria Shoesmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9750  Respondent: 10616289 / Hilary Percy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am not convinced about the need for so much new housing or the emotive reasons given by the council, ”new homes for essential workers such as nurses, teachers, police officers and firefighters”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9751  Respondent: 10616289 / Hilary Percy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that it is possible to improve the existing infrastructure (particularly roads) to cope with the influx of so many additional households.

I urge Guildford Borough Council to reconsider all its proposals within its draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I should like to voice my objections to the 2016 draft local plan.

1. I object to building within the green belt.

1. I totally disagree with the plan to remove Ripley and other villages within our local area from the green belt. Is this legal? It is certainly underhand and unfair. What is the point of having a green belt if it can be removed so indiscriminately?

1. I am not convinced about the need for so much new housing or the emotive reasons given by the council, "new homes for essential workers such as nurses, teachers, police officers and firefighters"!

1. I do not believe that it is possible to improve the existing infrastructure (particularly roads) to cope with the influx of so many additional households.

I urge Guildford Borough Council to reconsider all its proposals within its draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A42 Tannery Lane

Increasing housing density will damage the local rural environment and add yet more motor traffic to our congested local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/220  Respondent: 10616289 / Hilary Percy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Proposals within the Updated Local Plan I should like to make comments on the following:- Site A43 Garlicks Arch Proposal for additional housing and travellers' plots is an overdevelopment of the site with little or no justification. Individual identities of Ripley, Send and Clandon would be lost. Huge amount of extra traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/221  Respondent: 10616289 / Hilary Percy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A58 Burnt Common

The proposed increase in industrial floor space, plus waste management facilities in this area with its pretty, tree-lined entrance into the villages from the A3 is ill conceived. Huge amount of extra traffic, including large vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1797  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack for immediate provision for new schools

I object to the lack of any immediate provision for Doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2264  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1796  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of ANY evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to all erosion of the Green Belt

I object to any 'in-setting' (ie removal) of any villages from the Green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the removal of villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7805  **Respondent:** 10616321 / Petrina Jeffreson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the disproportionate amount of development in one area of the borough - why on earth would this be sensible (in terms of infrastructure and irreparable destruction) or fair? If destruction were needed (and I am not convinced it is) please share this out rather than spoiling one area. Also why on earth would you not, for example, seek to build on the edges of existing built up areas like Woking (where development would be extension rather than change) rather than changing the face of rural areas such as Ripley and the Horsleys forever?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9405  **Respondent:** 10616321 / Petrina Jeffreson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1157  Respondent: 10616321 / Petrina Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period
I object to last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1156  Respondent: 10616321 / Petrina Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I find it disgraceful and devious that we seem to successfully campaign against and avoid destruction of the area in one plan (wisley airfield), we look away for two minutes and then another devastating plan is mooted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1163  Respondent: 10616321 / Petrina Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1159  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch) GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were:

a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, …(site allocation A25) [ than the Burnt Common site did ]”

b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1160  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50
The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives. Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.</td>
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I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/230  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/232  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clock barn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/231  Respondent: 10616321 / Petrina Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4415  Respondent: 10616769 / Royal Mail  Agent: Royal Mail (Cushman & Wakefield) (Helen Harris)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
ROYAL MAIL GROUP REPRESENTATIONS:

**Guildford Borough Council - Proposed Submission Local Plan: Strategy & Sites 2016**

We are instructed by our client, Royal Mail Group Ltd (Royal Mail), to submit representations to the Guildford Borough Council – Proposed Submission Local Plan: Strategy & Sites 2016.

**Background**

Royal Mail is the UK’s designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail’s services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier.

The United Kingdom letter post business was fully liberalised in January 2006 and Royal Mail operates in a highly competitive market place. Royal Mail is continually seeking to find ways to improve the efficiency of its business, anticipate its customers’ needs and respond flexibly to changes in communications technology.

Land use planning is therefore an important issue for Royal Mail with regard to protecting their assets and operations, and in planning future investment across their estate and supporting its infrastructure. On this basis, Royal Mail’s involvement in the plan making process and working with Local Planning Authorities to sharpen and influence planning policy is considered critical to the future success of their business and in their continued role as the UK’s designated Universal Postal Service Provider.

**Royal Mail Properties**

Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the Borough of Guildford. This service is currently provided from the following properties:

- Guildford Delivery Office;
- East Horsley Delivery Office;
- Guildford Road Transport Warehouse/Support Services

Royal Mail possess long leases on the two properties in Guildford with no plans to relocate their operations in the near future. The East Horsley Delivery Office site is within freehold ownership and similarly, there are no plans to relocate in the foreseeable future.

**Representation**

Cushman & Wakefield have reviewed Guildford Borough Council’s *Proposed Submission Local Plan: Strategy & Sites 2016* in the context of its impact on the operations of the Royal Mail properties within the Borough. The delivery offices are of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery.

**Protection of Employment Uses**

All three Royal Mail sites are well established, having operated successfully for a number of years, serving a wide catchment area. Due to the nature of use, operations extend well beyond the normal working day, including associated vehicular movements. The potential juxtaposition of alternative, possibly sensitive land uses particularly residential uses adjacent or within close proximity to the sites is therefore of direct concern to our client. Given the business functions of Royal Mail, operations often take place in sensitive hours in the early mornings and late evenings which sees delivery times and the constant movement of delivery vehicles and would therefore result in significant residential / general amenity issues should sensitive land uses/new dwellings be located nearby.

It is therefore suggested that the wording of the following statement should be altered to afford greater protection to existing businesses and, therefore, the protection of employment uses more generally.
The current wording of Policy E3 (Maintaining Employment Capacity and Improving Employment Floorspace) states the following:

**In order to sustain and enhance employment capacity (including land, floorspace and/or jobs):**

- **Employment floorspace will be protected and the loss strongly resisted on the Strategic Employment Sites, which are defined in policy E.** Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least two years;
- **Employment floorspace will be protected and the loss resisted on the Locally Significant Employment Sites, which are defined in policy E.** Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 18 months;
- **Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites.** Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months.

Once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted.

The redevelopment of outmoded employment floorspace will be permitted to cater for modern business needs. The provision of improved ICT infrastructure will be encouraged in refurbished and redeveloped sites.

It is requested that supplementary wording be added to provide robust, ongoing safeguarding to the operations of existing businesses. Suggestive text is provided below:

“Development of a non-employment use will only be permitted when it would not detract from the employment use of the remaining sites in the area and; whether new development or changes of use impact on existing businesses, adequate mitigation measures are designed into the new site”.

In this context, it is considered vital that any new uses in the vicinity of the Delivery Office are designed and managed so that they are both cognisant of, and sensitive to, Royal Mail’s operations. Should sites adjacent to Royal Mail’s operations come forward for non-employment uses, such as residential or a hotel, they must be designed to attenuate the noise/amenity impact of any existing uses including Royal Mail’s operations and which can include working outside normal working hours. For example, scheme requirements may include amongst other things, triple glazing and due regard to the positioning of windows and private amenity space.

In addition, it may be necessary to manage potential adverse impacts through appropriate planning conditions.

This approach accords with adopted Government guidance set out in the National Planning Policy Framework (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting.

Furthermore, paragraph 123 of the NPPF states that planning policies should aim to recognize that existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. This is further supported by paragraph 9 of the NPPF, which provides amplification of what might be construed to be circumstances that lead to unreasonable restrictions:

“The planning system should contribute to the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risks from or being adversely affected by, a range of factors including noise pollution.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Transport Considerations

Royal Mail are fully supportive of the Council’s commitment to working to facilitate major, long-term improvements to the A3 trunk road and M25 motorway in order to improve capacity and safety as indicated in Policy I2 (Supporting the Department for Transport’s “Road Investment Strategy”).

It is requested that Royal Mail be kept informed of proposals for highways improvements in sufficient time in advance to enable for alternative transport arrangements to be put into effect/ effective re-routing strategies to be implemented to facilitate operations scheduling.

Conclusion

Royal Mail would welcome further engagement with Guildford Borough Council particularly where proposals would impact on the usage of the highway and allocations/sites next to or adjacent to the Delivery Offices coming forward for redevelopment.

I trust that these representations are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the adoption of the Guildford Borough Council Local Plan and other planning policy documents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My husband and I strongly object to the 2016 Draft Local plan, particularly all erosion of the green belt.

In the plan to build 14,000 new homes many of our local villages are to be removed from the Green Belt which will allow unlimited future development and the destruction of our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/558  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/773  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I
trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1582  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1583  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

6) I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary
school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1585  Respondent: 10617441 / Graham Sykes  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8) I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1580  Respondent: 10617441 / Graham Sykes  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)-

Allocation A35 -for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1584  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1581  Respondent: 10617441 / Graham Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/560  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/776   Respondent: 10617569 / Lydia Sykes   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows)- where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1590   Respondent: 10617569 / Lydia Sykes   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1591  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1593  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1586  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1592  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1589  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3606  Respondent: 10617569 / Lydia Sykes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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It is my assessment that the submission plan is unsound due to the number of errors in the plan, the poor quality and the lack of transparency in the evidence base, including the fact that large files have also been used again which are not compatible to those of us with poor internet connection. There is also a considerable lack of clarity.

I am writing to confirm my continued objection to the inclusion of A35, Three Farm Meadows in the draft Local Plan for the reasons as given below:

- It is the least sustainable site in both this and previous versions of the plan because of the constraints on the site and the physical location.
- It is further away from any railway stations than any other identified strategic site.
- It is adjacent to one of the most congested stretches of strategic road network in the country (ie M25 Junction 10)
- Local road are already at capacity particularly when there have been any incidents thus making the SRN not free flowing.
• Public transport is already having to negotiate the overcrowded SRN and is therefore unreliable and subject to frequent delays.
• It is also adjacent to one of the most popular visitor attractions in the south-east, the RHS at Wisley which attracts huge numbers. Any regular events which take place several times per year already result in extra traffic chaos and I feel this has certainly not been taken into account.
• There is insufficient employment available on site so that all residents will have to travel to work. It is unrealistic to assume that people will walk/cycle on narrow local road on a regular basis.
• I also object to any changes within the green belt boundaries.
• I also object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultants.
• I wonder and object to the fact that there has been no clear explanation why the council think it appropriate to have a regulation 19 consultation when the changes are major and needs to be based on the totality of the plan rather than the proposed changes.
• I object to the inclusion of A35 as it will not contribute to the 5 year housing projection due to constraints notably in the provision of sewage capacity.
• I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
• I object to a 10% inclusion buffer in the housing number over the plan period as it totally unnecessary.
• I object to the transport evidence base including the SHAR 2016 Highways assessment report which has already been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
• I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBSPA etc. I believe that the housing number is unsound and open to legal challenge.
• I object to the apparent disregard for the impact of in-combination development on the THSPA, particularly damage caused by nitrogen deposition and high pollution levels.
• I object to the differences in the housing figures set out in the Annual Housing Target table. Another glaring example of why the plan is not sound.
• I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I also object to the reliance of the Carter Jonas study update 2017 which includes “demand” for retail space from companies that are already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/572  Respondent: 10617601 / G Rabin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We have already had a number of re-developments in Ripley so these plans for extra housing is disproportionate.

There is no infrastructure.

There are not enough places at local schools now. The doctors are barely coping. It takes 2/3 weeks to get an appointment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/573  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are problems on A3/M25 most days as these roads are at capacity NOW. Everything comes to a standstill. On these days, more vehicles come through the village, trying to find alternative routes which causes long lines of traffic. Access on to the A3 at Burnt Common will not ease the congestion if there are so many more vehicles using the local roads.

Air pollution from thousands of extra cars affecting children, the elderly and even the RHS at Wisley.

Pedestrian and cyclist will be less safe on more crowded local roads.

I am not convinced we need all these new homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/571  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Ripley and I wish to object to the GBC draft local plan on the following grounds:

This local plan does not protect the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: pslp171/84  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new figure of 693 houses required in the borough per year. (322 in previous plans.) The figure cannot be verified. We should have transparency and the council should publish the SHMA report.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/80  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that this development will cause to the local village roads and lack of road infrastructure. There is too much traffic through local villages already. The rural roads are narrow and many have no footpaths. 5,000 more houses means dangerous and unsustainable traffic. Air pollution will be also be a big problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/81  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to development in areas which are at risk of flooding (Policy P4) The Plan does not take account of flood risk as required by National Planning Policy.</td>
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<td>The site at Garlick’s Arch has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>The infrastructure is already overloaded</td>
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<td>The schools are full to bursting</td>
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<td>The medical centre is already overstretched</td>
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More houses will mean more cars - some households will have more than one. The main route through East Horsley is a fairly narrow B-road, which is increasingly used by unsuitably large vehicles, which use it as a short cut from the M25/A3 to the A246. A car meeting one of these is forced onto the pavement, which is illegal & a hazard for pedestrians. This road cannot be widened because there are houses on either side. WE NEED TO REDUCE THE TRAFFIC, NOT INCREASE IT. The Thatchers site, which is next to a busy petrol station, will have access onto the A246 on an S-bend, where there is already a junction with Ockham Road South. This will surely become an accident black spot.

I appreciate that there may be a need for some new houses in the area, but nothing like the number proposed, which would completely change the character of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3049  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3050  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6146  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- C glandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higheotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPS16/6147</th>
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<th>10619169 / Wendy Critchlow</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12671  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12679  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12680  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12666  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12669  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12670  **Respondent:** 10619169 / Wendy Critchlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12682  **Respondent:** 10619169 / Wendy Critchlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12678  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/12676</th>
<th>Respondent: 10619169 / Wendy Critchlow</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12677  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12681  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</th>
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<tbody>
<tr>
<td>Our villages are already suffering from severe congestion for much of the day, for example the Newark Road &amp; Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</td>
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<td>Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.</td>
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<tr>
<td>I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.</td>
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<tr>
<td>Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.</td>
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<tr>
<td>With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.</td>
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<tr>
<td>The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.</td>
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<tr>
<td>The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.</td>
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<tr>
<td>This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.</td>
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<tr>
<td>The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.</td>
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<tr>
<td>Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to</td>
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court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12674  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12675  Respondent: 10619169 / Wendy Critchlow  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12658  Respondent: 10619169 / Wendy Critchlow  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific
balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12662  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12652  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1505</th>
<th>Respondent: 10619169 / Wendy Critchlow</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1506  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1507  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2615  Respondent: 10619233 / Alex I. Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Burpham and I write to express my very strong objection to Guildford Borough Council’s Draft Local Plan June 2016 for the development of Gosden Hill Farm. I have many objections to the development but chief among them are the following.

1. The development will be on the Green Belt and will result in the loss of a section of this valuable amenity forever.
2. The proposals for two thousand houses, offices and industrial sites, a Park and Ride, two schools and the possibility of a station will result in several thousand additional vehicles on already congested roads.
3. It is proposed that access to the A3 will be by a new A3 southbound of/on slip road and the present southbound slip road to Burpham and Merrow will become two way. Consequently, vehicles leaving Gosden Hill and
intending to travel north on the A3 towards London will have to travel through Burpham to the Clay Lane slip road. This will impact on Burpham which regularly experiences periods of severe traffic congestion.

4. Guildford is already a bottle-neck on the A3 and the Gosden Hill Farm development will exacerbate this problem. The only practical solution is to build a tunnel with a four way intersection near Potters Land and another one near Compton.

I have lived in Burpham for 43 years. The area has “played it’s part” in contributing to the development of Guildford following previous local developments which include: Weylea Farm; Weybrook Farm; Merrow Park, Sainsbury’s and Aldi’s. I am greatly disheartened by the proposed and unnecessary development of Gosden Hill Farm which will have very negative consequences for the local environment (air and noise pollution) as well as adding to the amount of traffic in an already congested area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7499  Respondent: 10619233 / Alex I. Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 10619905 / Louise Philips</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>As a resident of West Horsley I am writing to object strongly to the proposed development of East and West Horsley. This plan is far too ambitious. To increase the size of West HOrsley village by 35% is quite unrealistic. There is not enough infrastructure - medical centre, schools, meeting halls, shops, parking spaces and in particular the roads could not cope with l00s more cars and people. Whatever development takes place, a much better public transport system would be needed as the increased population would be gridlocked. I urge you to take a much harder look at these plans. <strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong> Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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| We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park ad a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:  
  • Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty  
  • Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt  
  • Increase tailbacks on the A31 and traffic congestion  
  • Result in rat-running through local roads  
  • Add to Guildford’s pollution  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/734</th>
<th>Respondent: 10620097 / Susan Elgar</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>
I am writing regarding the above, to strongly object to the following:

1. The removal of West & East Horsley villages from the green belt by insetting. The implication of which will completely change the character, balance and nature of these villages for ever, losing historic value and precious green belt. There is no 'exceptional' justification for building on this green belt.

1. The proposal of high density housing within West & East Horsley, is a staggering increase of over 35% more. However, there is no evidence of improved infrastructure. Already these villages combined have only one overcrowded medical centre, one over subscribed under 11's academy school and badly potholed roads. The inevitable increase in cars on the roads, will not only further damage the road surfaces and create traffic congestion, but parking for the shops and railway station will become a nightmare. The drainage in the Horsley's is barely coping at the moment, and it is understood from Thames Water that further housing developments, will be unlikely to cope and the foul drainage system will need to be upgraded.

1. West Horsley appears to have a disproportionally high % increase in housing (35%), compared to other locations eg: Ash & Tongham 16% and Guildford Town 11%. This coupled with the 2000 homes proposed on the former Wisley Airfield site, which has reappeared in The Guildford Plan, will have a totally unreasonable and unjust impact on the Horsley villages.

I urge you to please give my comments consideration, by keeping West & East Horsley villages within the green belt and not redefining the boundaries, to avoid unsuitable, unnecessary and unsustainable housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The proposal of high density housing within West & East Horsley, is a staggering increase of over 35% more homes. However, there is no evidence of improved infrastructure. Already these villages combined have only one overcrowded medical centre, one over subscribed under 11's academy school and badly potholed roads. The inevitable increase in cars on the roads, will not only further damage the road surfaces and create traffic congestion, but parking for the shops and railway station will become a nightmare.

The drainage in the Horsley's is barely coping at the moment, and it is understood from Thames Water that further housing developments, will be unlikely to cope and the foul drainage system will need to be upgraded.

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I urge you to please give my comments consideration, by keeping West & East Horsley villages within the green belt and not redefining the boundaries, to avoid unsuitable, unnecessary and unsustainable housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of any immediate provision for new schools
I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2607  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools, the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2332  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the limited consultation period
I OBJECT the last minute inclusion of new sites with less than 2 weeks notice.
I OBJECT TO the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT STRONGLY to all erosion of the Green, “in setting” (ie removal) of any villages from the GREEN BELT. The disproportionate amount of development in one area of the Borough.

I object to the limited consultation period, the last minute inclusion of new sites with less than 2 weeks notice, to the lack of any evidence for the alleged housing need numbers. I object to the lack of immediate provision for new schools, the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL EROSION OF THE GREEN BELT.
I OBJECT TO any “in-setting”(ie removal) of any villages from the Green Belt.
I OBJECT TO the disproportionate amount of development in one area of the Borough.
I OBJECT TO the limited consultation period
I OBJECT the last minute inclusion of new sites with less than 2 weeks notice.
I OBJECT TO the lack of any immediate provision for new schools
I OBJECT TO the lack of any evidence for the alleged housing need numbers
I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9703  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL EROSION OF THE GREEN BELT.
I OBJECT TO any “in-setting” (ie removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10832  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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I OBJECT STRONGLY to all erosion of the Green, “in setting” (ie removal) of any villages from the GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>SQLP16/1359</th>
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The disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period, the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/993  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new housing at A43 Garlicks Arch, as the development would cause many more cars to use the already clogged roads, through Ripley and Send.

Where there is much pollution now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6681  Respondent: 10621825 / Dorothy Wilkie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan on the following points.

1. Increased volume of traffic
2. Loss of green belt
3. High level of development in on area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I write as a Normandy resident and council tax payer. I wish to OBJECT to the Local Plan as far as it affects Normandy.

This Local Plan has been poorly handled and is a disservice to the community. Previous statements to our parish have been changed without reasoning and my feeling is one of being traduced by our Council. I OBJECT to the misuse of my council tax monies.

In particular I wish to bring to notice of those responsible the current TRANSPORT position of site A46.

A

• There are two railway bridges on the perimeter of the current suggestions
• These railway bridges are dangerous with poor sight lines in both directions on each access making four transport risks in total.
• Both bridges have been subject to emergency repairs in the last five years.
• Surrey County Council has been monitoring the volume of traffic in this area in the last year

Hence any dramatic increase in traffic from the suggested site will worsen the existing perilous situation on Westwood Lane and Glaziers Lane. I OBJECT to the Local Plan on this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The Guildford Road (from Bailes Lane to Saint Mark's Church) has become saturated with traffic as a result of the lack of effective road planning around Guildford.
• Three accidents have taken place in the vicinity of the church this year- including one fatality
• The existing primary school causes serious traffic congestion as a result of a broad catchment area
• The access and parking to Wanborough station is currently lacking in investment

Hence the proposal to develop a secondary school requires significant transport infrastructure to support parents, children and residents. Exposing more children to transport and environmental risks would be folly of a high order. I OBJECT to the Local Plan on this point.

Consequently I urge the Council to withdraw this foolish and inadequate plan for Normandy. The consultation has highlighted the need for essential investment in the local transport infrastructure. This investment is already overdue and increases in transport demand should be factored into any future considerations. This inevitable is a precursor of a major housing development that will destroy the village I love.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2912  Respondent: 10623873 / Andrew and Ruth Sandilands  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to say we strongly don’t want any houses being built at Wisley Airport and proposed sites near Ripley. The traffic up and down Newark lane is terrible and very dangerous, so we don’t want more houses built at the proposed sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8172  Respondent: 10623969 / E. J. Hope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the 2016 draft local plan to remove Ripley, Send and Clandon from the Green Belt. 

SAVE THE GREEN BELT.

Also not something must be done about the present traffic situation in Ripley, attention to this matter is long overdue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8368  Respondent: 10624129 / M Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am totally against the local plan you proposed on 6 June 2016.

In my view, the removal of any green belt protection amounts to the desecration of the countryside. Many parts of these areas have rare & or protected animal & plant species.

The additional housing planned for our villages and at Wisley Airfield would mean about 5500 additional vehicles on our very narrow country lanes. The government promised to return the airfield site to green belt after the war and although not formally returned it is as good as.

There are already long traffic queues on the A3 north bound & south bound at the M25 junction during rush hours. Given Wisely/Horsley areas are so close to the M25/A3A junction adding another junction (or feed in to the existing routes) would create chaos on both the M25 and A3.

There are large areas to the West of Guildford that would be much more suitable for development. For example, the area north of the A3 towards Woking also would be better able to accommodate additional housing and traffic as would Farnham, Aldershot, Farnborough & Fleet.

Equally there are many brown field sites around these areas and around Guildford, Leatherhead, Godalming & Dorking which should be used in place of your proposals.

There is no large demand for additional housing in this area. Additionally, there are not enough doctors in the area, there are not enough schools or teachers in the area.

As a retired teacher I can assure you that expanding existing schools is not a solution & would mean education standards would drop dramatically - large schools invariably mean poor standards of education (& indeed behaviour).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1518  Respondent: 10624129 / M Arnold  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly wish to emphasise the danger posed by an additional 2000 homes at the old Wisley airfield site will add significantly to the existing horrendous traffic problems at the A3/M25 junction during the rush hours.

I hope you will find it helpful if I explain that no amount of fiddling around with the access to the A3 will resolve the problem of say an addition 3000 cars joining the A3 so near to the M25 junction.

In any event, there is no local requirement for additional housing in the area whereas there is a considerable desire to retain the green belt as it is without interference from outsiders who have no interest in the area.

I thought the point of having a ‘consultation’ was to listen to what people are saying and to act on the feedback. You seem to have very largely ignored what almost all people have said.

You seem to ignore the fact that there are already too few doctors in the area, too few teachers and no demand for additional shops/retail development. There are many care homes and sheltered developments in the area.

You seem to totally ignore the obvious opportunities to development at Leatherhead, Dorking and Guildford. It makes one wonder if there is a vested interest at work – particularly bearing in mind the recent history of planners benefitting from their connection with developers.

The green belt was devised to prevent exactly this type of proposal.

The plan remains largely unchanged and thus all the original 30,000 odd objections made previously remain.

I must say this latest proposal is designed to change very little and to hope that people give up objecting because it does no good. It seems you think that if you just change the plan a tiny bit it will go through without problem and if you do it often enough the residents will give up.

I know of many who have given up objecting as it alters nothing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local Plan 2016

I write to confirm my total opposition to the local plan you proposed on 6 June 2016. The reasons for my opposition are:-

1. In my view, the removal of any green belt protection amounts to the desecration of our lovely villages & countryside. Many parts of these areas have rare & or protected animal & plant species.

2. The roads around this area are far too narrow and are clearly unsuitable for any additional traffic. My estimation is that an additional 643 houses would mean about a further 1200 cars using our narrow lanes and roads (see also next point).

3. The proposed development of 2000 houses at Wisley Airfield would add about another 4000 cars all trying to reach the A3 or M25 at about the same time each day. In all about an extra 5000 cars would be generated without taking into account the additional commercial vehicles.

4. The narrow country roads cannot support this additional traffic growth nor could it be safe to put so much additional traffic onto the A3 and M25. A large number of vehicles would try to avoid the bottle necks that would be created by using the minor roads as escape routes (rat runs).

5. In any event it was promised that the Wisley Airfield would be returned to green belt after the war and the government promise should be kept.

6. There are already long queues on the A3 north bound & south bound at the M25 junction during rush hours.

7. The decision on local expansion should lie with local people not with people who would be unaffected.

8. There are large areas to the West of Guildford that would be much more suitable for development.

9. The area north of the A3 towards Woking also would be better able to accommodate additional housing and traffic as would Farnham, Aldershot, Farnborough & Fleet.

10. Equally there are many brown field sites around Guildford, Leatherhead, Godalming & Dorking which should be used in place of your proposals.

11. There is no large demand for additional housing in this area.

12. There are not enough doctors in the area.

13. There are not enough schools or teachers in the area.

14. Expanding existing schools is not a solution & would mean education standards would drop dramatically- large schools invariably mean poor standards of education (&indeed behaviour).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4243  Respondent: 10627457 / Graeme Morrison  Agent:

| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
CONTEXT
Firstly it is necessary to understand the context of the plan, particularly as it relates to the Horsleys.

The basis of the plan
A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the input assumptions or mathematical model on which their calculations have been made. That their forecast is 70% above that of the accepted figure from other sources may give you some cause for concern. Without a full understanding of the assumptions, you cannot be sure that your plans are firmly based. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.

SPECIFIC OBJECTIONS
I object to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility.

I object to the final target housing number (based on a mathematical model which has not been disclosed) which is almost 70% higher than the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10627457 / Graeme Morrison</th>
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I agree that a modest amount of additional housing is needed in the Horsleys and in the Guildford borough and that a better mix of properties is needed, in particular, more properties for first time buyers and for those wishing to downsize.

However, I object strongly to the scale of extra housing proposed in the Draft Plan because this is based on what I believe to be some fundamentally flawed calculations and a complete lack of understanding of the environment of the Horsleys.

The Environment of the Horsleys

The Horsleys are ill equipped to cope with significant development as any rational analysis will quickly expose.

1. a) The road network

East and West Horsley can only be accessed on restricted roads

From the South

Ockham Road South is restricted so that a lorry and car cannot pass at Lynx Hill and the road remains narrow into the village.
The Street has limited access at the Bell and Colville roundabout and near Edwin road it is reduced to single file traffic.

From the North

Ockham Road North is a narrow country road which can’t take two lorries passing.

Old Lane is narrow, with a number of hazardous bends and a difficult junction into Cobham road.

From the West

The road from Cobham is the best route into Horsley but it is restricted at the railway bridge on Forest road. This road takes a lot of traffic as it is the access road from Horsley to supermarkets at Cobham.

From the East

A series of narrow roads provide access from Burntwood but none is capable of sustaining significantly increased traffic.

b) Retail Structure

The retail environment at Station Parade consists of 25 premises plus 3 at the bottom of Cobham Way, including a library, post office, chemist, 5 restaurant/cafes, butcher, baker and 2 mini supermarkets. The largest of these units are approximately 170-200 sq. m. There is no room for expansion of retail premises nor for the provision of extra parking places. This cannot be expanded or developed to a worthwhile retail centre. Bishopsmead, to the south of East Horsley is much smaller and similarly constrained. West Horsley has virtually no retail presence.

c) Infrastructure

There is already pressure on school places, doctors surgeries and parking. The Horsleys cannot sustain a significant increase in demand. In addition, there is limited space for expansion of any of these facilities.

d) The Geography of the Horsleys

The Horsleys lie just north of the A246 which runs to the north of the North Downs. Rainfall on this area flows north and causes periodic flooding in heavy rain. There are frequent problems with storm drains flooding in the Horsleys. Green belt land in and around the Horsleys is needed to absorb this water run off. Further building will exacerbate this problem.

I object to the proposed in-setting boundary to replace the Green Belt around East and West Horsley. This new boundary includes some valuable green community space such as Kingston Meadow (by EH Village Hall) and Horsley Tennis and Cricket Club which will then be vulnerable to future development. These spaces are valuable amenities and are an essential part of the life of the village.

I object to the lack of understanding of the infrastructure constraints of the proposed new households on the Horsley villages and to the absence of any effort to deal with them.

If around 2,600 new houses were built in the Horsleys, Ockham and Wisley airfield this could easily result in around 5,000 more cars within a three mile radius of the villages.

Traffic

This would have a huge impact on local roads which as outlined above have little scope to be widened (e.g. pinch point at Lynx Hill on Ockham Road South and the restricted area on East Lane) or otherwise altered to cater for such an increase.

Although it is proposed to upgrade the current A3 junction at Burntcommon to a full 4-way junction. SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane (all not suitable for increased traffic volume) for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond.
The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”.

A local plan when proposing new housing on a substantial scale must surely plan for the implications of increased traffic both on the major roads such as the A3 and the minor village roads. The current draft local plan has not given such issues enough consideration.

Parking

Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the Horsley medical centre and at the village hall will not be able to cope with this additional demand.

Flooding

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Other areas of the Horsleys are also flooded when it rains because the drains are inadequate. Substantially more houses will exacerbate the problem but no attention has been paid to drainage in the local plan.

Schools and medical facilities

Amenities

Local schools and medical facilities are already at capacity.

No extra school places are planned in the Horsleys and the school places proposed at Wisley Airfield will not be planned until many years into the project. 2600 new houses could easily mean 2600 children looking for school place!

I trust the Council will review its Local Plan basing it on a model which is available for inspection and with more attention to the infrastructure implications and use of brown field sites rather than destroy our Green Belt - a precious amenity gifted to us by visionaries from the past.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17325  Respondent: 10627457 / Graeme Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal that Station Parade in East Horsley be designated as a Rural District Centre. The reasons for this proposal are obscure but it is patently unsuitable for the type and scale of developments that that designation allows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the **Green Belt**. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

The Green Belt around the Horsleys serve all 5 of the purpose set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.

As outlined above, the green belt is not just a pleasant amenity but also an essential protection against flooding

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the fact that this inflated final target housing number results in:-

- up to a 35% increase in the number of households in West Horsley.
- up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield

The infrastructure of the Horsleys as outlined above cannot support this expansion.

In addition, 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp173/382  **Respondent:** 10627457 / Graeme Morrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) Proposed change to the settlement boundary. Under amendment 4 shown on the map attached as Appendix H, the settlement boundary is to be extended further south to encompass all of this area. This land is close to, and in some parts adjacent to, Surrey Hills AONB. It is wrong to propose its inclusion in the settlement boundary.

I STRONGLY OBJECT TO THE MOVEMENT OF THE SETTLEMENT BOUNDARY PROPOSED UNDER AMENDMENT 4 IN APPENDIX H MAP OF EAST HORSLEY SOUTH

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2864  **Respondent:** 10627457 / Graeme Morrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4) Policy A35 Land at former Wesley airfield, Ockham. In the AECOM assessment, this site has, by some margin, the poorest sustainability appraisal. GBC is proposing to choose to ignore the many hundreds of objections lodged in respect of the planning application for this site. I STRONGLY OBJECT TO SITE POLICY A35, THE CREATION OF A NEW SETTLEMENT AT THE FORMER WISLEY AIRFIELD.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1311  Respondent: 10627457 / Graeme Morrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) Policy D1 Infrastructure and Delivery. I consider the level of investment proposed in the Plan for infrastructure development to be totally inadequate. The proposal fails to address the inadequacies of the existing infrastructure nor to address the additional investment that would be required were the current plan to be accepted. I STRONGLY OBJECT TO THE INADEQUATE PROVISION OF INFRASTRUCTURE INVESTMENT ACROSS THE BOROUGH PROVIDED FOR IN THE PLAN

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1309  Respondent: 10627457 / Graeme Morrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Policy S2 Borough Wide Strategy
   a) The conclusions of the revised SHMA are seriously flawed for various reasons, inter alia:- *the GL Hearn report suggests a requirement for some 654 houses per annum. This is an increase of 22% of the current housing stock for a projected population increase of just 10.4%
   b) GBC fails to make any allowance for planning constraints, particularly the Green Belt. The already overstretched infrastructure is not addressed. GBC Proposes to remove large swathes of the Green Belt, without demonstrating the required ‘very special circumstances’ to justify such action. GBC Is ignoring the many thousands of objections to this part of the proposed plan. I STRONGLY OBJECT TO THE BOROUGH HOUSING TARGETS SET OUT IN POLICY S2
<table>
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<tr>
<th>Comment ID: PSLPS16/5961</th>
<th>Respondent: 10627681 / John Davis</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

I object to the late inclusion of the A43 Garlicks Arch development as resident of Burnt Common Lane this will have a substantial effect on myself and my family. This development will obviously completely change this small and sleepy hamlet of Send and Ripley. One of my main concerns is with regard to flooding. It is also a site with a large amount of ancient woodlands. The industrial development is certainly not needed, and with regard to the housing it my belief that the housing need for the area has been grossly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5963</th>
<th>Respondent: 10627681 / John Davis</th>
<th>Agent:</th>
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</table>

I object to the proposed interchange with the A3 at Burnt Common because Send would need to take the traffic from the proposed Wisley Airfield site and from Gosdon Hill thus causing horrendous traffic jams and nobody getting anywhere quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5965</th>
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<th>Respondent: 10627681 / John Davis</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of the Travellers pitches at Send Hill as this area is not very accessible being a single tack country road in part.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12086</th>
<th>Respondent: 10627681 / John Davis</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to both Sends removal from the Green Belt, the reason a lot of the local residents have chosen to live in and around send is because of its green belt and thus it green fields and open spaces. It also provides us with a buffer from both Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am emailing with regards to the proposed Guildford Local Plan to register my objection to this most horrific proposal which sets to destroy a substantial part of our Green Belt.

I would like to register that;
I object to the 2016 Draft local plan as the developments proposed are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/2688</th>
<th>Respondent: 10633761 / Guida Esteves</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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7. I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5655</th>
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I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
There are no exceptional circumstances which allow for the removal of Garlick’s Arch from the Green Belt. Central Government states clearly that housing need is not an exceptional circumstance.
The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.
The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.
- The proposal would double the built area in the locality, and would irreversibly damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.
The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/5653</th>
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4. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
New on/off ramps to the A3 at Burnt Common would cause irreversible damage to the local communities. These are deemed enable to enable the strategic site of Wisely Airfield which is 4km away. The current road network in the village is already overstretched. The GBC Local Plan should be aspirational when looking to support the level of growth proposed. The existing road network expansion is constrained by its location and setting within existing villages and urban housing. As such a forward looking plan would look towards new roads rather than over-burdening the existing roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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6. I object to the development proposed at Send Hill (A44)
The site is unsuited to the 40 houses proposed with a negative impact on the small rural road which is Send Hill. This site would also impact the use of the multi-denominational burial group on Send Hill.
The borough policy is for 2 traveller sites per 500 houses, but it has allocated 2 sites in a development of 40 houses. Also, the Guildford Borough Traveller Strategic Housing Land Availability Assessment (Traveller SHLAA) of June 2014 does not include the traveller site (A44) in Send Hill and as such this has not been appropriately assessed. This Traveller SHLAA is also absent from the housing evidence in the regulation 19 consultation. Only the 2012 Traveller Accommodation Assessment is referenced as evidence. (http://www.guildford.gov.uk/newlocalplan/16277).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sqm proposed. That site was removed from the Plan without any reasoning.
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.
The rural roads in this area are narrow, in poor condition and have no footpaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 485+ houses in planned for Send. The Village Medical Centre is Send is the service for Send, Send Marsh, Burnt Common and Ripley. The impact of the proposed growth cannot be understated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11125  Respondent: 10633761 / Guida Esteves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2. I object to the failure to protect the Green Belt (Policy P2)
The Greenbelt constraint has not been applied to Send, and I object to removing Send from the Green Belt by insetting. The insetting of Send, Ripley and Clandon along with the proposed large developments in Send (A43/A43a), Gosden Hill (A25) and Wisley Airfield (A35) will increase the houses in these villages by 4400 – these 3 sites would therefore deliver 42% of the 10395 requirement set out in Policy S2. This is places a disproportionate burden on these three villages and their already-stretched infrastructure, but will result in urban sprawl – one of the key reasons for the existence of the Green Belt. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Guildford Borough Proposed Submission Local Plan (June 2016)
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
The consultation has been done under Regulation 19. There are substantial changes to the Regulation 18 consultation held in 2014 and thus a consultation limited to 6 weeks is insufficient to allow full understanding of the Proposed Submission and its evidence base. The evidence base presented has 28 documents, 14 of which have been updated since the previous consultation, which no indication provided of what has changed. The Proposed Submission without appendices is 255 pages and the evidence base (excluding other documents) is over 2500 pages. A significant amount of detail to be assimilate in 6 weeks. The Proposed Submission and its evidence base has changed too much, without any details of those changes, to fir into a regulation 19 consultation.
The reasons are I object are:
1. I object to the proposed overdevelopment of Send and that Policies S1 and S2 are not sustainable
The GBC proposal for 10395 new houses for the 15 years from 2018 to 2033 (13,860 from 2013 to 2033) is not sustainable. The outcome of the Regulation 18 consultation was the delay of the GBC Local Plan where the then GBC leader, stated that the council had taken on board the concerns of residents and the revised plan would, with support from central government, apply infrastructure and Greenbelt constraints. There is no evidence of this in the Regulation 19 Proposed submission which has not only increased the average annual housing numbers; it has increased the housing allocation for Send (which includes the settlements of Send, Send Marsh and Burnt Common) from 431 to 485.
This overdevelopment of Send will damage the communities and I am concerned that an infrastructure need 4km away (i.e. a new A3 junction to enable the Wisley Airfield site) is having a disproportionate impact on Send, Ripley and Clandon. At a public meeting in Send on the 14th June, the GBC leads for planning and infrastructure confirmed that the 400 houses planned for Site A43 (Garlick’s Arch) are the price the landowner is being “paid” for gifting the land for the new A3 junction at the same site, called A43a. The price will actually be paid by the residents of Send, Ripley and Clandon, and this is not acceptable.
Not only is this housing development inappropriate for the community, it also adds 7000sqm industrial development. This is in addition existing brownfield industrial site located at Burnt Common. This is an over-development of dwellings and employment space for such a small community.
The evidence quotes the 400 homes as “additional homes that can be provided in the early years of the Local Plan” (Guildford Borough Flood Risk Sequential and Exception Test May 2016). Therefore in addition to allocating 400 houses in Send to satisfy an infrastructure requirement 4km away, the proposal is to also bring these forward to the early years of the plan to satisfy housing targets for the rest of the borough.
The Plan is unbalanced across the borough; 42% of all the housing proposed from 2018 to 2033 is in Send (A44/A42/A43/A43a), adjacent in Send (A25), or in Ripley (A35).
This proposed over-development of Send is in contradiction of the “The Rural Land Assessment” provided as evidence, which states that the GBC should:
? “Retain the distinct separate settlements of Send, Send Marsh and Ripley and avoid merging these through linear development along rural roads. Retain gaps such as along the B368 between Send and Send Marsh or between Ripley and Send Marsh along the B2215.” (page numbered 117)
? “Conserve the rural roads minimising small-scale incremental change such as signage, fencing or improvements to the road network or bridge, which would change their rural character particularly to the north and west of the area.” (page numbered 117)
? “Resist urbanisation of roads through encouraging appropriate surfacing of existing pavements, enhancing the immediate landscape setting and ensuring minimum clutter. Retain the distinct separate settlements of Send, Send Marsh and Ripley and avoid merging these through linear development along rural roads. Retain gaps such as along the B368 between Send and Send Marsh or between Ripley and Send Marsh along the B2215.” (page numbered 117)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LRN9 to LRN13 inclusive will not address and mitigate the increased traffic flows forecast by SCC's OGSTAR (Jan 2014) under Scenario 7. The A323 Guildford Road is already stationary in the morning and evening peak. LRN21 is welcome, but it will only transfer the problem in the morning peak eastwards towards Normandy.

LRN19 won't convert Westwood Lane from an unlit rural lane with an uncontrolled one way constriction under the single lane railway bridge into an urban road taking traffic from the proposed Policy A46 new 1100 home "village" onto the A323 or A31. Furthermore, no upgrade is proposed for Glaziers Lane on the other boundary of the proposed Policy A46 development.

FRR5 won't address the flood risks associated with the site of the proposed Policy A46 new village. This is on the spring line of the Hogs Back and the ground is saturated for much of the year. It is unclear if the foul sewer network connecting back to the nearest sewage farms will support all the additional sewage created by Policy A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/184  Respondent: 10634465 / Peter Stratford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of the proposed development under Policy A29 is unsustainable in terms of local infrastructure and amenities. Manor Road is already heavily congested during the morning and afternoon school runs. Residents from the new housing developments wishing to commute to local employment centres or to local stations for commuting further afield will find the congestion on the roads leading out of the development sites unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/590  Respondent: 10634465 / Peter Stratford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed developments west of Guildford, in particular A29 and A46, when considered in conjunction with the Aldershot Urban Extension planned by the adjacent county, are unsound in terms of sustainable transport infrastructure.

The proposed road upgrades under Policy I3 as described in Appendix C of the Local Plan will not mitigate the road usage forecast in SCC's OGSTAR Scenario 7. Neither will the proposed new railway station or cycle route.

A possible solution might be a Bus Rapid Transit network using the disused railway alignment through Ash as part of its alignment. The transit of the green belt between the Ash/Tongham and Guildford urban areas would generate environmental impact issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/221  Respondent: 10634465 / Peter Stratford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object. There is no evidence base for a new secondary school west of Guildford in Normandy/Flexford.

Secondary schools to the west of the borough are under subscribed by approx. 700. There are other new secondary schools already approved, the new Technical College, expansions at Guildford County and St.Peters, the new Hoe Valley School. There is a proposal for a 5F secondary school at Rokers, Worplesdon.

Even if a further new secondary school was required, it would be better located nearer the borough's centre of population, such as Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/241  Respondent: 10634465 / Peter Stratford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A29 has been revised following the withdrawal of Policy A30 which proposed a "sound" alignment for a road over bridge for the A323 at Ash railway crossing. Paragraph 9 of amended Policy A29 now effectively replaces deleted Policy A30 with what is a demonstrably poorer solution for traffic along the A323 corridor. The original alignment for the over bridge proposed under Policy A30 is now made impossible by the exclusion of land immediately north east of the railway crossing from the Plan.

During the public drop-in event at Tongham on 15 June, I understood the GBC transport planning team representative to say that potential developers were "not interested" in supporting Policy A30 and, as GBC "had no money" for funding the railway over bridge, it was down to potential developers to propose a new bridge alignment that they would be prepared to fund. Any such alignment would seem to have to involve a significant diversion of the A323 in a "U-bend" via a series of roundabouts through the new housing estate and then almost backwards along Foreman Road to connect into the current alignment just south of the railway crossing.

This is a retrograde change to the Plan as it would lead to a deterioration in the quality of the A323 corridor for through traffic between Aldershot and Guildford compared to the previous proposal under Policies A29/A30. This section of the revised document is therefore considered "unsound".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Reinstate Policy A30 to make the document "sound".

Attached documents:

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**Comment ID:** PSLPS16/1559  **Respondent:** 10636833 / Veronica Denny  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

i am a local resident living at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

Two years before my retirement I applied for an allotment. The reasons being twofold.

1] I live alone and have no close family and was anxious that in some part the loss i would feel of my work colleagues would be diminished if I could establish a new social group through contacts on an allotment. I remembered how beneficial the friends my grandfather had made through his work on his allotment after his wife died in helping him through his loneliness.

2] I am a firm believer in the beneficial effect of being in the open air. My allotment keeps me active and I have the pleasure of giving my surplus produce to some people in social housing who benefit from having their food bills reduced by my gifts of produce, especially really fresh fruit.

If access to the car park off the Aldershot Road was removed I would have to drive through a built up area on a regular basis to access my plot.

Additionally it would be too far for me to walk, which is what I do when not needing to take heavy sacks etc to the allotment or bring out and distribute the produce. I am aware that many of my "new friends" also use the Aldershot road access and I feel it should be retained for vehicular use. Without it I would be adding to the carbon footprint of Guildford.
I value my sanctuary of green space, the one air, the bird song, companionship and the reason to get up and keep active even if the weather is not very inviting. Please do not remove a really important green space especially in one of the more built-up areas of Guildford. So please consider the above in relation to point 14.

Thank you for reading my comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3827  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft local Plan as it has paid no regard to the additional schools that will be required or the increase in General Practitioner or hospital services. This alone makes the plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3826  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the raising of the annual number of houses built each year. With no rational reason being given, one must assume this is being done for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7172  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

---
I object to new sites (Garlics Arch) being introduced as an “after thought” when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the draft plan without Highways England’s consent. This will only add to the existing congestion on the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16101  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local plan.

I object to the disproportionate number of houses being proposed for the country lanes to absorb. Over 70% of these are within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16102  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the villages of Ockham, Ripley, Send and the Horsleys from the Green Belt without exceptional circumstances being identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the disproportionate distribution of houses across Guildford Borough, the north east has taken an unsustainable number, in an area where country lanes are narrow, street lighting and pavements are limited or nonexistent. The current high density of traffic now using through routes results in them being "gridlocked" at peak times. There has also been an assumption for which there is no evidence that there will be more cyclists. The area has no cycle paths. Public transport across the area is poor and is currently being reduced which in itself will result in putting more cars on the roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the methodology of drawing up the plan. Guildford Borough has employed consultants who allegedly have planning experience, but have not taken account of Surrey County Council highway planners views or the costs involved in improving infrastructure, which is currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to the Village Neighbourhood plans. Logic would suggest planning is best formed by a bottom up rather than top down approach.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>is Sound?</td>
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<td>is Legally Compliant?</td>
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</table>
I object to the unfair imbalance of the Plan across the borough.

The Plan has become even more biased against the North East part of the borough. Guildford Borough covers an area of over 100 square miles. Of the 1,1350 homes currently proposed in the Plan, over 40% (4613) are within 3 miles of Ripley, Burnt Common and Send Marsh, most of them on Green Belt. This is grossly unnecessary and unfair on an already overcrowded part of the borough. The removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough places an unnecessary burden on the northeast section (Ripley and Send).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4219  Respondent: 10638209 / Wendy Rockhill  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the principle of hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan openly conceals some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4220  Respondent: 10638209 / Wendy Rockhill  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the principle of hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan openly conceals some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4213  Respondent: 10638209 / Wendy Rockhill  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

The Plan contains inconsistencies in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total assessed “need” of 8 places, (page 40, 4.2.22.) and so no “need” exists for this in site A34. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4212  Respondent: 10638209 / Wendy Rockhill  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4221  Respondent: 10638209 / Wendy Rockhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4216  Respondent: 10638209 / Wendy Rockhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object specifically to ‘Garlick’s Arch’ (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Travelling Showpeople sites in A34 ‘Garlick’s Arch’
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan. NB: A travelling showpersons site with associated storage is completely inappropriate in a rural environment, and I note the intention to release this land for additional housing in the future, should it prove an unnecessary allocation.

**The inclusion of site A58 Burnt Common, removes the need for A43 Garlick’s Arch**

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were:

> The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm... (site allocation A25) [than the Burnt Common site did]” The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (Burnt Common and Garlicks Arch – which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives. A58 Burnt Common provides more than the “required” industrial space, so there is no reason for Garlick’s Arch to be included.

**I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch**

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

**I object to the principle of hiding of development by “deferment” (A24, A25, A26, A43)**

This version of the Plan openly conceals some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/5205  **Respondent:** 10638209 / Wendy Rockhill   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The Foreword to the plan by Paul Spooner includes on page 5:

> “We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4217  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan contains inconsistencies in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total assessed “need” of 8 places, (page 40, 4.2.22.) and so no “need” exists for this in site A34. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4215  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

The inclusion of site A58 Burnt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm... (site allocation A25) [ than the Burnt Common site did ]” The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”
Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (Burnt Common and Garlicks Arch – which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives. A58 Burnt Common provides more than the “required” industrial space, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2467  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the rationale resulting in the need for massive increase in housing stock in the borough which is based on flawed evidence. Guildford Council’s assessment of housing need is overestimated by about 40% because of inaccurate assumptions about the number of students seeking to remain in the area once completing university studies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2471  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

WE NOW KNOW that if the developer doesn’t even have to provide any ‘affordable’ homes, simply to make a negotiated payment to the Council, this is highly unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not
delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is shocking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2488  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for ‘it’s insetting’ (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/446  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send. These increase the impact on local areas by increasing the number of houses, traveller’s sites and destruction of even more of the Green Belt, rather than as promised, take account of the thousands of objections to the 2016 Plan and many of its unnecessary proposals. The Green Belt, was intended (and has generally succeeded thus far) to provide breathing lungs encircling large towns and cities, to improve air quality, increase opportunities for city dwellers to experience countryside and fresh unpolluted air, and generally to assist in preserving quality of life.

Many of the proposals will result in Guildford Town in the over populated and congested south east even more than at present, puts the opportunity for ‘breathing lungs’ even further from inner city dwellers reach, and increases the problems caused by potential over-crowding and congested living. The proposals focus on housing, without consideration of health, transport and education provision, unless funded by the sale of property to fund the necessary infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS
I OBJECT TO THE LACK OF EVIDENCE OF ANY IMMEDIATE PROVISION FOR DOCTORS SURGERIES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3346  Respondent: 10638241 / Irene M Bleach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/288  Respondent: 10638241 / Irene M Bleach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO ANY REMOVAL OF ANY VILLAGES FROM THE GREENBELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN TWO WEEKS NOTICE
I OBJECT TO THE LACK OF ANY EVIDENCE FOR THE ELL EGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/3347 | Respondent: 10638241 / Irene M Bleach | Agent: |
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5300  Respondent: 10639425 / E.A. Archer  Agent:

I object to the enclosure of protected Green Belt land within the proposed new village boundaries, for which there will be a presumption for development in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5299  Respondent: 10639425 / E.A. Archer  Agent:

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to comment and express my concern on the proposed Guildford Borough Council Local Plan as part of the consultation process. While I recognise the importance of strategic local planning and recognise the considerable amount of time and effort necessary to devise such plans, I have a number of objections with this plan as it currently being proposed. I have detailed these below:

I object to the number of homes that the Local Plan intends to deliver

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6459  Respondent: 10640801 / Gordon Stonehouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

"New Version of Guildford local plan-Objection to Shalford Green Belt/settlement boundary" We wish to add our objection to the New Version.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/838  Respondent: 10641953 / Wiesia Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also OBJECT to policies A37, A38, A40 and A41. These involve the excessive expansion of West Horsley, an increase in its housing by 36%. West Horsley is one of the first lines of defence against urban sprawl by the London conurbation. And GBC wants to rip up the rules on protecting the Green Belt to put up some more housing here. This is fundamentally wrong and I OBJECT to it.

My conclusion is that GBC have put a huge effort into creating a monster here which nobody wants except for Guildford’s planning department and maybe a few of Guildford’s councillors who campaigned at the last local election on the basis of protecting the Green Belt. Doesn’t look like it to me, so I OBJECT TO THE LOCAL PLAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES POLICIES:

Policy A35: Wisley Airfield. I object to this proposal. The proposed Wisley development is probably the craziest thing in this entire document. It represents Town Planning at its very worst. The idea is to build what is effectively a new town in the heart of beautiful and historic Surrey countryside, full of pretty villages which have grown up over a thousand years. The traffic impact will be horrendous. The impact of the protected wildlife next to this site will be catastrophic. All new services will need to be brought in. And who will guarantee that all of this actually ? Well.....actually, nobody knows because the entire project is being run anonymously. Everything that is wrong with town planning in England is symbolized in this proposal. I OBJECT TO POLICY A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2: GBC says it is protecting the Green Belt, but I didn’t notice it. It seems like 65% of the housing is to go on land now in the Green Belt. This is totally outrageous.

Part of this policy says that East Horsley will be in-set from the Green Belt. I OBJECT to this. The policy has worked well in our village so far, don’t change it.

Part of this policy also puts forward changes to the Green Belt boundaries in East Horsley. I OBJECT to all of these. None of them seem to be justified. And taking two large fields from behind Ockham Road North, which flood all the time, is just plain ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2838  Respondent: 10641953 / Wiesia Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On some of your specific policies, I wish to register my OBJECTIONS to the following:

POLICY S2: As I said already, the housing numbers are much too high. Also, following BREXIT, the numbers of immigrants coming into UK will go down for sure, so even the 15% projected rise is now looking too high. Also, GBC’s economic forecasts, which you use to justify all this extra housing, all of this will need to come down too. I think you really need to re-work all of your figures here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/649  Respondent: 10641953 / Wiesia Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Overall, I OBJECT to this plan. It seems to me that the housing numbers you’re proposing to build are much too high for this area. I don’t understand all of the analysis you’ve presented to justify them, which all looks so complicated that I suspect the authors try to make it deliberately confusing on purpose. But my feeling on this is that GBC have put forward a plan that not many people want, apart from the town planners. If the Government is forecasting population in this area will rise by 15%, how on earth can GBC put forward a plan to increase its housing stock by 25%? Also, given that so much of the Borough is Green Belt, why isn’t this taken into account? The majority of the land for housing is coming out of the Green Belt, which is just plain ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1635  Respondent: 10641953 / Wiesia Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to build a new town on the site of the former Wisley airfield is an appalling idea and should be removed from the Local Plan without delay. This site has no redeeming merits whatsoever. It has no facilities or infrastructure, will destroy local wildlife, will see new homes build in an area of high air pollution, and it will have a major impact on local schools, doctors’ surgeries, etc. This is a picturesque, historic area. To transplant a piece of central London and parachute it into the midst of these five beautiful rural villages is the worst planning proposal I have ever seen.

This site should have been removed from the revised Local Plan. It is a mystery to me why it was not, when other sites with far fewer deficiencies were removed. I strongly object to Policy A35.

For these three major reasons I object generally to the revised Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/436  Respondent: 10641953 / Wiesia Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The level of new housing proposed in the Local Plan is still much too high. A proposed increase in the housing stock of the borough of 22% is far too high a target to set. With Brexit almost certain to lead to lower levels of population growth, this very high level of new housing development is unnecessary and will create all sorts of problems in the borough where infrastructure is already over-stretched and where our green areas are becoming increasingly spoiled. For this reason I strongly object to the revised policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Every morning the A3 experiences heavy traffic from the services to the M25. These developments will add considerable traffic (even more with a new junction at Burnt common). To propose these large developments without any roads is naive and short sighted.

Schools and health services in this area are full, where is the proposal for more schools and health centres?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I must object to the local plan for the following reasons:

The Traveller Site at Valentines Farm in Ripley. The Council and local residents have spent a lot of time, effort and in the councils case taxpayers money objecting to this development through its many applications and appeals. Nothing has changed except you have included in the local plan. The site is still on the greenbelt. To suddenly include it in the local plan is tantamount to admitting that all the money and effort spent before was a waste. The site should be returned to open fields when the temporary permission ends. To include it extends the village boundary into greenbelt and green belt must be protected not just for us but for future generations. It is what makes this area of surrey such a pleasant area to live in.
The Developments around Send, Ripley, Ockham and the Horsleys represent over 20% of the housing proposed in the local plan. It is a heavy burden to place on villages that represent 0.3% of the population of the borough. It seems grossly unfair and looks like political bias.

Every morning the A3 is solid from the the M25 to the services heading north. The proposed entry slip at Burnt common will only make this worse. It is naive and short sighted to propose the number of new houses in this area with no additional infrastructure. If the council is serious about this plan new bus routes and train stations should be proposed.

The Valentines Traveller site and the Wisley Airfield site have seen a large number of objections over a number of years from local residents. To include both in the local plan, ignoring the objections from local residents is outrageous and disrespectful.

A local plan should be representatives of all residents of the borough I feel that this plan is not and should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6215  Respondent: 10643073 / C Prowse  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

I must object to the draft local plan. I have grown up in Ripley and feel that the proposed developments on the old Wisley Airfield, at Garlicks Cross, the three developments in West Horsley and the traveller site at Valentines farm are too much for this area.

The developments are too large and will overload the roads and public services. The Traveller site at Valentines is on greenbelt land. Greenbelt land is precious and must be protected.

Developments should be within existing village boundaries and not result in villages expanding into open fields and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7171  Respondent: 10643073 / C Prowse  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()
The Council fought the Planning permission at The Paddocks / Valentines Farm through its many appeals and spent a lot of time, effort and tax payer's money on these appeals. To now include this site in the local plan suggests that all that money was wasted. I am sure the council does not want to be accused of wasting tax payer's money. The site is still occupied by travellers on Green belt land and should be returned to open fields at the end of the temporary permission and not included in the local plan. Further, the existing occupants are already in breach of the temporary permission and extending this is likely to increase the breaches and destroy even more green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All these sites are extensions to existing village (a complete new village in the case of the wisely airfield). This will result in urban sprawl. Developments should be within existing village boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Former Wisley Airfield, Garlicks Cross, the three developments around West Horsley and the Traveller pitches at Valentines farm are all on Green belt land. Greenbelt is precious and must be protected and to build on it is depriving future generations of the open countryside that we have enjoyed and all benefitted from.

The Green belt land must be protected, these continuous encroachments are putting it more and more at risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16096 | Respondent: 10643073 / C Prowse | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local plan allocates a large percentage (over 20%) of new housing in the local plan to the villages of Ripley, Send, Ockham and the Horsleys). This seems to be a very biased distribution and heavy penalty for these small villages to bear. Surely if more housing is needed then it should be allocated evenly across the Borough and we see no evidence that this is the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2072  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Building development is aiming for 2021 and a tunnel for 2023-2027. Surely the tunnel comes first before putting housing in its way. This development between Burpham and Clandon will double the size of Burpham. We already have excessive traffic problems; this development has nothing to show its infrastructure will avoid or improve this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2633  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Any development at "Gosden Hill Farm" needs a 4 way interchange on the A3 road, close to Burpham's slip road, this is planned from 2021 but is out of kilter with an aspirational "Guildford Tunnel" which if done is likely to be in this area, will not be delivered until 2023 -2027; so there will be a period of intense traffic overload in Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am a resident of Burpham for over 30 years and I wish to Object strongly to the Guildford Borough Council’s Draft Local Plan June 2016, as it is unsound.

Development on Gosden Hill Farm which is in Green Belt land has not been thought through. There is a clash of plans, to build a vast development, including, homes, schools, park + ride, train station etc. but no plan for its traffic control other than through Burpham village, and an aspirational plan for a tunnel under Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Build smaller homes for first time buyers and/or for the elderly to free up larger family homes.

Do not rely on a system where developers build large homes to finance smaller ones. Build social housing out of Government funds now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have a neighbourhood plan in Burpham that protects the open spaces in the locality but was unable to prevent a sustainable movement corridor being suggested which I feel is unsound. There is no room on the roads to carry the proposed cycle, traffic and pedestrians particularly at the roundabouts

1. Woodruft Ave – George Abbott School
2. Kingspost Parade – Retail shops
3. Sainsbury’s

Add into this mix a proposed development of 2000 homes at Gosden Hill.

No evidence of the additional pollution of this slow extra traffic to cyclists and locals on foot.

I also wish to support the Guildford Residents Association points and oppose the intended increase to the size of Guildford by a quarter; mostly north of the town, in this draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5896  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

Most of the aspirational development on this draft plan are in Green Belt and no justification to change the existing area has been made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I would like to see more brownfield sites used for homes in the town centre and not a focus on retail.</td>
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<td>Housing Numbers</td>
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<td>There is no sound justification for the increased estimate of housing numbers from the last draft plan in 2015.</td>
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<td>Firstly, the Tannery Lane proposal of 45 homes would bring the already grid locked Send Road (at peak times) to a halt as a potential 90 additional cars turning onto Send Road would cause traffic chaos.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Adding 400 homes to Garlicks Copse will no longer alleviate the existing traffic burden and will add extra local traffic on Portsmouth Road / Send Road which you will still have to get across to get to the new junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The entrance on to the A3 is something that is required already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The site at the top of Send Hill also has no capacity for additional traffic. Both of these roads are accessed by Send Road or tiny lanes with few passing points. The lack of decent public transport in Send means that cars are essential with a lot of families needing 2 or more vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6689  Respondent: 10645281 / Barbara Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Mrs Barbara Nicholls object to Guildford Borough Council’s proposed to move the Green Belt Boundary to exclude these field, Guildford Borough Council should support the expressed views of the local residents to protect the fields from development. They should retain them within the current Green Belt Boundary and Keep them outside the village settlement boundary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/750  Respondent: 10645601 / Ian and Sophie Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

REF: OBJECTION TO:

GUILDFORD PROPOSED LOCAL PLAN 6/6/2016 - FIELDS BEHIND SHALFORD VILLAGE HALL

I am writing to object strongly to the recent change made to the local Shalford plan which has removed the fields behind the Village Hall and Tennis Club from the Green Belt by putting them in the Shalford settlement boundary. If developed, this would completely change the ‘rural’ character of this area, which is so vital to preserving the surrey countryside in the face of the enormous pressure to build on every available space possible. The green lung that this provides is not only essential in making sure that the countryside is protected but also contributes to making sure that excessive building does not damage the very heart of this rural countryside.

My great concern is that this represents a direct encroachment of our most valued resource, which once lost cannot be returned. Although these fields have been classified as “open spaces”, this does in effect substantially reduce the protection
of the area from housing development, compared to being designated as Greenbelt. What horrifies me is that this has been
done without any explanation or confirmation. Any construction on these fields would be 25ft above the village hall and so
tower over both the tennis courts and bowling green. This would totally change the green aspect of both these facilities, as
well as the village green and pond area – which is currently an amazing common area for locals to relax and wander across
on a sunny afternoon. It would also generate considerable traffic on Chinthurst lane, adding to the traffic chaos and
pollution that already exist, thereby increasing the potential for an accident.

I therefore propose that this area be adjusted back to the 2003 boundary, and so be protected once again as greenbelt land,
to ensure that these fields remain as open spaces and that Guildford Borough Council takes on its environmental
responsibility to keep central Shalford as rural as possible. As a resident and member of the Shalford Tennis club I urge
you not to allow the loss of this lovely green land which is so important in helping Shalford to remain a village, and retain
its wonderfully green backdrop which is so important to ensuring it retains it’s full character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/473  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt - especially RIPLEY

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1318  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt - It is vital for our health, our children's health and to preserve the very nature of our area's NATURAL beauty and wildlife

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1319  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to ANY removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1320  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/301  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/281  Respondent: 10647073 / Gatwick Airport Ltd. (Amanda Purdye)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough is outside of our 15km ‘physical’ safeguarding area but is within our 30km wind turbine safeguarding zone. Therefore should any wind turbines be proposed in the Guildford Borough we would ask that the airport be consulted at an early stage, as they have the potential to interfere with radar utilised by the airport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:   PSLPS16/5608   Respondent:  10647169 / Richard Johnson   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed Wisley airfield development seems to have paid little account to the needs of infrastructure - approx 4000 extra cars all driving on the existing roads/lanes, children accessing secondary schools (do the schools have places?) will result in road chaos.

Air and noise pollution from the nearby A3 and M25 exacerbated by the extra 4000 cars - will it be a healthy environment to live in?

The Wisley development will eventually result in the unintended amalgamation of the villages of Ripley, Cobham, Effingham and Horsley into one large strip development - has that result been considered and planned for?

To sum up, the proposed housing developments are too big, seem to lack forward planning and there is no infrastructure planned to deal with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:   PSLPP16/11068   Respondent:  10647169 / Richard Johnson   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The infrastructure in Horsley is still based on the needs of a small village; the roads/lanes are too narrow, the parking is limited and the extra cars created by the occupants of 593 houses + the 2000 at Wisley will resort in gridlock (they will all commute, there is little business in Horsley)

Drainage/sewerage system is antiquated and cannot cope with the current demands; when it rains water flows down from the A246 through the Horsleys all the way down to the A3 roundabout. If it rains heavily it floods and is impassable; 2500 extra houses with all the water running off the concrete surfaces will require major infrastructure development to cope with it.

There is one primary school in Horsley, a stretched medical centre, no NHS dentist, the shopping facilities are mainly met by a small Budgens convenience shop - who will develop these facilities on what land) to meet the demands of the new homeowners?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11066  Respondent: 10647169 / Richard Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed building of 593 new houses is out of all proportion to the village’s current size; it is understood that there is need for housing, but where did these numbers come from, based on what criteria?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2011  Respondent: 10647585 / A.C. Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed plans of the GBC for several reasons.

1) The government vowed to protect the ‘Green Belt’. To remove Ripley and Send from the ‘Green Belt’ would violate this agreement.
2) Building so many houses on Wisley airfield and at Garlick's Arch and other sites would create one large urban sprawl and destroy an ancient and historic (900 years old) village.

3) It can be almost impossible to exit my drive in the rush hour with cars at a standstill a mile back to get on the A3 which is now at full capacity.

4) There is a lack of evidence for such numbers of housing.

5) There is no immediate provision for infrastructure.

6) The Wisley airfield proposal has previously been turned down and is prone to flooding.

7) Increased air pollution.

8) a disproportionate number of building disposal in the beautiful area.

9) The present frequent congestion on the A37 M25 would become a nightmare.

10) The present A3 was built to save Ripley but already too much traffic passes through this historic village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to you because I object to the 2016 Draft Local Plan.

In particular I **object** to any encroachment on GREEN BELT land which under your plans would be lost forever and deprive future generations from enjoying it.

You are obviously targeting the villages in North Surrey and I **object** to your policy of 'in-setting' these villages, particularly Ripley, Ockham, Send, the Clandons and Horsleys to name just some. I **also object** to what is clearly a disproportionate amount of development in one area.

I **particularly object** to the underhand way in which the Garlick's Arch site has been handled allowing a development of at least 400 houses to be considered with less than 2 weeks notice.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3893  **Respondent:** 10648353 / Hugh Proctor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Although there are many other aspects of the latest version of the Guildford Plan which have clearly not been thought out properly, I will not add to my list of objections at this stage, except for the outrageous issue which is the long standing Wisley Airfield site and the fact that despite a unanimous decision of the Council to turn down this Application, it has been allowed to remain as part of the Guildford Plan. This disgraceful decision is an assault on the electorate and unless speedily rectified will be indelibly engraved in the hearts and memories of voters. So you may take it that I **also strongly object** to any development of the Wisley Airfield site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/107  **Respondent:** 10648353 / Hugh Proctor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Site A35 Wisley Airfield
I object to the proposed increase to 95.9 hectares. The resultant increase in traffic volumes would be excessive on top of the existing traffic levels especially in Ripley where traffic is often at a standstill at morning and afternoon peak times. Newark Lane, in particular, cannot cater for any additional traffic and yet it would be the most likely favoured route for traffic to Woking from the Airfield development. Once again I object to the gross misuse of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Site A43 Garlicks Arch
I object to the increase in houses to a figure over 600. I further object to the provision for Travelling Showpeople Plots, which would obviously involve the use of articulated lorries and other transportation vehicles. These would be wholly unsuitable in this area, especially when accessing on to the B2215 road. The proposed inclusion of these plots is out of line with the original plan and is in a Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Site A58 Burnt Common
I object to the change which includes this new aspect of industrial development which may involve Waste Management Facilities. It would be totally unsuited to this area and would involve very considerable additional heavy traffic on the local, overloaded, roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/919  Respondent: 10649441 / Peter Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1153  Respondent: 10650785 / Janet Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. School:

My understanding is that the proposal to virtually double the size of Normandy is the need for a school in west Guildford. Keith Witham has researched all schools in the area and every one is undersubscribed, Kings Manor by as much as 57%. The birth rate in the area has decreased over the past 3 years or so and I fail to see the need for another school when the present schools are not at capacity.

1. Amenities:

Whilst I acknowledge we have a Church, a Doctors’ Surgery and a railway station, that is about the limit of useful amenities in the area. It can take 3 weeks for a non urgent appointment at the Surgery! What is it going to be like with a population double the size? The railway station car park is extremely limited in parking spaces, not actually counted but my guess is a maximum of 10. Cannot see how this can be enlarged with the car park being surrounded with houses and businesses.

I do understand that there is a need for more housing in the area and personally I have no objection to a couple of small pockets of new houses, but to build on the scale at present proposed by Taylor Wimpey is ludicrous. Taylor Wimpey are
only interested in making a vast profit without a thought of the local residents, or the great difficulties it will be to travel around with a huge increase in population.

I strongly urge the Planning Committee to view the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1151  Respondent: 10650785 / Janet Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to the above Plan.

Reasons:

1. Infrastructure:

Both Glaziers Lane and Westwood Lane, which on the Plan are either side of the proposed project, are narrow country lanes. Westwood Lane has a narrow one way system under the railway bridge and on Glaziers Lane the bridge has a bend and blind spot. Neither road has footpaths its entire length, not without crossing from side to side, and on Glaziers Lane one has to cross on a bend. The A323 is extremely busy, especially at peak times. The turning into Glaziers Lane from A323 is extremely tight and I have witnessed accidents there. The thought of another 2,000 car owners plus the extra traffic a school would bring does not bear thinking about.

I strongly request an Inspector views these roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1148  Respondent: 10650785 / Janet Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Green Belt:

I have lived in Normandy for many years and I truly value our green belt. There are brown field sites around which possibly could be improved by having new houses on. Why can’t empty office buildings be turned into accommodation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/795  Respondent: 10650849 / Pauline Hawkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the above proposed change. I belong the the Shalford Lawn Tennis Club and live in Wonersh and so frequently visit and travel through the area.

Should this change occur, the land would not be protected from housing development. If this were to occur it would be devastating to the area in terms of visual amenity. The land is significantly higher than it’s surrounds, so any development would be a real eyesore and ruin the green nature of the village. Furthermore, the roads around such a development are already incredibly under pressure and simply cannot cope with the inevitable increase in traffic that any development would case. My son attends a school in Guildford and I am only too aware of the very lengthy queues leading up to the roundabout in Shalford from both the main road from Wonersh and also from Chinthurst Lane. Furthermore, Chinthurst Lane is not an easy road to negotiate either as a driver or a pedestrian, with very narrow stretches, sharp/blind bends and no pavement in places, so to add even further traffic to such a road would make it even more of a danger to both kinds of user.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2105  Respondent: 10650945 / Claire & William Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3227  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further to a previous comment, please note the following comments, based on the background "topic" paper on Housing, dated June 2016.

para 4.172 states "The effectiveness of the plan is partly measured by the ability to demonstrate a five year supply of deliverable housing land..." Although it will be for a Planning Inspector to determine the effectiveness of the Local Plan, it does seem, from the Council's own figures, that the Plan is not sufficiently robust.

para 4.12 The Council does not appear to have attempted to record brownfield land in its area. This is fundamental within the NPPF.

para 4.15 I am able, by reference to a specific example, to demonstrate that the LAA does not identify "...all sites that are suitable, available and achievable for housing..."

para 4.59 This paragraph does not adequately identify the specific Court of Appeal judgement. It is possible that it refers to Neutral Citation Number: [2016] EWCA Civ 168 : 17 March 2016 (aka Richborough Estates Partnership LLP). That landmark judgement applies to all housing policies, of which settlement boundary is a comparatively minor one.

Currently, Guildford's "out of date" Green Belt policy has much more relevance to the Local Plan. The judgement is currently resulting in many planning appeals being allowed, both locally and nationally.

para 4.60 To describe a density of 50 dwellings per hectare, in a village, as acceptable - but "relatively high" must be highly questionable.

para 4.124 This site has been reintroduced, after being quietly omitted from the previous draft plan in 2015. The circumstances are particularly questionable because the site is part owned by the Council. It is not accurate to say that the site will be "removed" from low sensitivity Green Belt. The site will remain in the Green Belt, but will be built upon.

What is meant by "one of our more sustainable villages"?

para 4.155 Every figure given in the table is significantly "rounded". There are no step changes. It is very unlikely to be based on any realistic assessment of a timeline for housing completions. Its only purpose appears to be justification for a total number of 10,395 dwellings.
para's 4.156 and 4.157

These two paragraphs confirm there is to be no realistic attempt to resolve the accrued backlog of housing as required by the NPPF. An Inspector will determine whether this is reasonable.

para 4.167 to 4.171

These paragraphs, above any others, clearly indicates that this latest draft Local Plan will not conform to the NPPF.

para 4.169 is an outrageous misrepresentation of data. It is stated that "For the last seven years, completions have been less than 300 homes per year. In reality, the highest number achieved was 262. The annual average for the seven years is actually 203. [NB : The above statement would have been equally true if it had read "For the last seven years, completions have been less than 2,000 homes per year].

It should also be noted that annual housing completions in Guildford have reduced significantly since the introduction of the NPPF in 2012.

para 4.171 The statement "This is not possible to achieve during this period (2018/19- 2022/2023) without significant harm to the Green Belt and other harm. This would require development of many high sensitivity Green Belt sites, which we do not consider a reasonable option" is a clear indication that the draft Local Plan will not conform to the NPPF.

Why does the draft plan not contain such an "unreasonable" option for public consultation, utilising "low sensitivity" sites?

para 4.173 "As described above, it is imperative that an adopted plan is not immediately out of date due to lack of five-year supply of deliverable housing land – this would defeat the point of adopting a new Local Plan. The steadily increasing housing target enables a realistic prospect of a five year supply of deliverable housing land to be identified post adoption of the plan, and puts a plan in place that can significantly boost housing supply in Guildford Borough (as per the requirement of the NPPF).” This is simply an Invitation to an Inspector to find that the housing policies of the Council are currently wholly inadequate - but agree that, at some undefined point in the future, a magic wand can be waved.

In my humble opinion, the current Local Plan is unlikely to be adopted in its current form.

The Council has already been identified on a very small list of LPA's whose Local Plans are not sufficiently advanced and are consequently at risk of Government intervention in 2017. One Local Plan was withdrawn without being submitted for examination. This second is likely to draw a similarly large number of NIMBY objections, possibly resulting in further delay. It is therefore possible that a calculated risk to prompt such intervention is being taken by Councillors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4127  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Neighbourhood Plan(s)

1. It is disappointing to note the virtual absence of adopted Neighbourhood Plans in the Council's area. These could have usefully informed the Local Plan.
2. Send Parish Council systematically objects to almost all planning applications in its area, on grounds which are entirely parochial and without merit as material planning issues.
3. However, it belatedly applied for NP status. Correspondence indicates that the members appear to lack the necessary expertise to develop a successful plan. In the event that they employ specialist planning consultants, it is likely that their advice will simply be rejected by either the parish council or the residents referendum. This may happen even if is consistent with an adopted Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7697  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3  Wisley airfield (support proposal)

3.1 An application was recently refused on the grounds of "inappropriate development" in the Green Belt, giving future objectors a convenient menu of items for their continued opposition. However, it is apparent that the Council is actually in favour of the development and further applications will come forward in due course.

3.2 At this stage, there can be no certainty that it will ultimately be approved. If 2000 houses are suddenly removed from the housing proposals to meet an "objectively assessed need", then the whole plan will be in jeopardy at examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7696  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2 Garlick's Arch, Send Marsh - support proposal

2.1 This proposed development appears to be entirely sustainable, and it is perhaps surprising that it was not identified previously. It has a long frontage adjacent to the A3 and, with suitable Sec 106 agreements, would have similar credentials to the Wisley aerodrome site.

2.2 The NIMBY campaign by local groups should be given little weight. Such campaigns completely ignore the severe shortage of housing in both locally and nationally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17017  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 Green Belt - support proposals

1.1 Notwithstanding a comprehensive evidence base, circa 20,000 objections led to the demise of the original Local Plan. Given the scale and content of those objections, it is unlikely to be resolved by the current draft Plan. However, it is clear that the officers have done their very best to try to resolve this long standing problem. There must be some building in the Green Belt.

1.2 The Government has done nothing to ease the situation with its repeated public statements promising to "protect" the Green Belt. However, a recent Court of Appeal judgement (Mar 2016) has resulted in many more successful applications and appeals. Lack of a 5 years housing supply means that other policies previously restricting housing are now deemed to be "out of date".

1.3 I am not aware of any other LPA's having proposed a "traffic light" classification for Green Belt land. The only conceivable reason for incorporating such a system is to ease housing pressures by building on areas with the lowest classification (such as Send Hill Farm) However, it is likely that NIMBY's and bodies such as CPRE will object to this, quoting the original, but now outdated, Green Belt rationale

1.4 GBC development control continues to refuse Green Belt applications for the flimsiest of reasons. This is easily seen by the increased number of appeals being allowed and also by the successful applications for appeal costs against the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17018  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6  Alternative suggestion for allocating housing in a Local Plan

Setting aside all planning designations (including AONB, Green Belt etc), every community in the country from the smallest hamlet to the largest city should designate area(s) of land to accommodate "x %" of the number of existing dwellings. That percentage could vary every 5 years and calculated centrally to satisfy the nation's housing shortfall.

If "brownfield land is available - then it should be used. Otherwise those people currently blessed with pleasant protected countryside should bear the same burden as any urban residents.

Nimbyism defeated at a stroke !

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1879  Respondent: 10653537 / Mike Elrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5  GBC planning appeals

5.1 One measure of a successful local plan is the ratio of appeals which are dismissed and allowed.

5.2 Many of the recent successful appeals are the result of members of the planning committee overturning officers recommendations. This often leads to appeal costs being awarded against the Council. This may be due to poor officer reports or members NIMBY'ism. Either way, this will have to change if Guildford is to come even close to meeting its "objectively assessed need".

5.3 Delegated officers continue to refuse Green Belt applications for the flimsiest of reasons. Once again, the Council has a relatively poor record with an increasing number of appeals being allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5371  Respondent: 10653633 / J L Stainer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21
I am writing to record my support for the retention of the Aldershot Road site as allotment land. The site is well used and very popular and is a welcome green space in our crowded vicinity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is unclear what persuasive arguments have been made by the developer Taylor Wimpey to GBC such that site A46 which was not included as a development site in the draft plan should now appear. Flexford and Normandy and the land in between have been summarily removed from the Green Belt despite GBC policies stating the intent to protect the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/475  **Respondent:** 10655201 / Robert Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Other than the developer lead proposal it is not clear what GBC have done to assess the fit of the proposals with their own policies. In particular has any assessment been made of smaller, potentially less intrusive and more equitably shared developments throughout the borough? Even Normandy arguably has more appropriate and less sensitive sites available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/477  **Respondent:** 10655201 / Robert Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The case for a school is weak and is not backed up by clear evidence as to its need from GBC. Justification hardly surprisingly comes through the developers interpretation of needs. I understand that neither Ash Manor nor Kings College are well subscribed and clearly have scope for additional pupils now and expansion on their existing sites in future. The planned large development at Blackwell Farm would seem to be a better located place for a school.

Transport infrastructure is poor and the proposals contained in the plan particular for roads are quite inadequate. The A323 Aldershot to Guildford Road is exceptionally busy at peak times and congestion is commonplace leading to extended journey times in my own experience of 30-40 minutes. The junctions from both Westwood Lane and Glaziers lane which bound the proposed site are poor and difficult to safely negotiate particularly when turning right. This leads to queues building along both approach roads. The delays are worse if there are problems on the A3 and
The platforms at Wanborough station and indeed most stations on the route to Ascot can only accommodate 4 car length trains. Extensions may be possible but at a significant cost to run longer trains. Network Rail can advise whether the infrastructure would support operation of additional services but any changes would no doubt be costly.

Environmentally the site is of great natural beauty and has amenity value for walkers, dog walkers and as an open area and provides part of the break between the conurbations of Guildford and Ash. The views particularly north towards the Hogs Back and south towards the Ash ranges heathland are exceptional. The way marked path between Glaziers Land and Westwood lane is a popular route. The path and surrounding fields are prone to be extremely wet and muddy with standing water a frequent occurrence during the winter suggesting a high water table that will not be resolved by simple drainage. Buildings on parts of Normandy have been subject to subsidence in the past because of heave and thrust in the underlying London Clay. On a regular walk it is common to see foxes, deer, hares and rabbits as well as domestic farm animals all of which would be displaced by development.

As the developers share price has dropped by some 30% in the last few days as residents we would seek assurance that a clear decision will be taken and acted on and that decisions and plans are not deferred leading to a blight on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 📑 IMG_2723.JPG (2.0 MB) 📑 IMG_2721.JPG (2.2 MB)

Comment ID: PSLPS16/476  Respondent: 10655201 / Robert Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a public footpath through this site which will need to be protected. It leads to an unprotected crossing of the railway. Housing close by is likely to encourage use of this crossing and increase the risk of accidents to users and those who see the railway as a playground. This site is always boggy and is prone to flooding. The pond has historic value as it is part of the falx making process from which Flexford got its name. The road access through the Paddocks and the narrow partially made track alongside the proposed site are inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/281  Respondent: 10655201 / Robert Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the revisions contained in the Proposed Submission Local Plan 2016; Strategy and Sites. In particular sites A46 and A47. My specific comments are shown against the relevant sections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/245  Respondent: 10655361 / M Trevill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6] I OBJECT TO the lack of evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/759  Respondent: 10655361 / M Trevill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7] I OBJECT TO the lack of IMMEDIATE provision for new schools

8] I OBJECT TO the lack of any immediate provision for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/757  Respondent: 10655361 / M Trevill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL EROSION OF THE GREEN BELT – It is vital for our health our childrens health and to preserve the very nature of our area’s NATURAL beauty and wildlife.

1] I OBJECT TO all erosion of the Green Belt – especially RIPLEY
2] I OBJECT TO ANY removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3] I OBJECT TO the disproportionate amount of development in one area of the Borough
4] I OBJECT to the limited consultation period
5] I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am opposed to the recent changes made to the above local plan.

I live on Ripley High Street and find that at certain times it takes a long time before I can cross the High Street. If these local plan changes go ahead our village will be endangered by a HUGE increase in traffic.

At Garlicks Arch, for instance, the increase in housing and inclusion of travellers’ plots plus storage facilities is likely to cause massive amounts of large vehicle movements through this village.

A further concern is that waste management facilities to the strategic industrial sites potentially at Burnt Common. This is all unnecessary and does not provide local residents with enough info for a proper consultation.

I object to the site A35 [former Wisley Airfield] increase to 95.9 hectares. This would be likely to cause more congestion and pollution. Nitrous oxide levels are already above safe levels THIS IS VERY SERIOUS AND DANGEROUS for people and for wildlife.

There are now 60 houses suggested at the A42 Tannery Lane site [instead of the 40 on the original plan]; MORE CARS on the local roads. Our local lanes/roads cannot take any more traffic.

Please reconsider and do not take us for fools. Scrap these plans PLEASE,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/89  Respondent: 10655457 / Barbara Scantlebury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/768  Respondent: 10662337 / Christopher Hadley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to Object to policy P2. On the grounds that:
Impact on traffic, and infrastructure, seems to have been ignored. Impact on water catchment and flood plains ignored.
Brexit has introduced new market conditions which have to be analysed.
Impact on local agriculture seems to have been ignored.
Balance of housing requirement for Guildford is disproportionate to the remainder of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1955  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.[1]

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

Under the plan, rural West Horsley will take 35% of new homes, Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than sneaking in site proposals as a fait accompli.
These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council has no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not improve it.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with 2,100 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality now.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (East of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3881</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee recently rejected a recent planning application for precisely this development was unanimously on 14 separate grounds.[1] This deceived many residents into thinking that it has been defeated: scandalously, the site had been included in the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers that they should try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given additional months to refine their application. Residents are disturbed by apparent party links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.[2]

Three Farms Meadows before WW2 was a valuable argricultural asset to the UK. It still is. It grows enough wheat for 1 million loaves of bread.

The hamlet of Ockham gladly helped the war effort by allowing the fields to be used for the defence of the realm on the understanding and promise from HM Government that after hostislities ceased it would be returned to farm land and the hamlet to a quiet rural existence. For their loyalty to King and country the villagers have been let down and subjected to the threat of the engulfment of the hamlet and the end of their peace and quiet as well as the loss of a valuable food production resource that the country needs to be self supporting (UK only produces half of what it consumes as food. - 2015).

Ockham is a historic place. The home home of ‘William of Occam’ philosopher and author of Occam’s Razor.

Ockham is the home of ‘Ada Lovelace’ the world’s first computer programmer (now on the UK passport)

The site of ‘The Ockam Hoard’ a Bronze Age Hoard of bronze axe heads and jewellery now at the British Museum.

The hamlet is a Grade 1 listed architectural treasure and must be protected.

Please remove Three farms Meadows from the Local Plan immeadiately.

Policy A35 should be summarily removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”;
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it;
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA);
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts;
- Absence of adequate traffic data;
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school;
- Loss of high-quality agricultural land (55% of the site), in breach of national policy;
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households;
- Presence of a Surrey County Council safeguarded waste site;
- Cost of infrastructure required to the detriment of alternative more favourable sites;
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity;
- Impact on listed buildings;
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA;
- Extreme housing density with tiny garden spaces;
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure;
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames;
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.


[2] Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3880  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events that accompanies climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8310  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy A40 underestimates the problems of safe access and egress. Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly.

These problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site access. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum speeds of over 80mph. No traffic calming measures have been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D2 - Sustainable design, construction and energy

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns in the Green Belt that are environmentally and socially unsustainable. These settlements will require vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and higher greenhouse gas emissions and noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not meet urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.

All the stated policy aims for “inset” villages will be negated by the sheer weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E1 - Meeting employment needs**

I OBJECT because -

the evidence base is unreliable;

there is unclear differentiation between B class uses;

only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;

industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

the rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1054 of 3142
POLICY E2 - Location for new employment floorspace

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8224  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy which permits changes of use from B1a (offices) to C3 (residential) and has recently been reaffirmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8225  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of the University of Surrey than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”
This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8226  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8227  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8229 Respondent: 10662849 / Garry Walton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside.
There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

This policy also fails to provide guidance on design requirements, as required by the NPPF.[1]

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street are symptomatic of shifting consumer patterns. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford’s unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners

[1] NPPF 59: “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8230  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8215 | Respondent: 10662849 / Garry Walton | Agent: |
| Do you consider this section of the document; complies with the Duty to Cooperate? | , is Sound? | , is Legally Compliant? |

POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8216 | Respondent: 10662849 / Garry Walton | Agent: |
POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8237  Respondent: 10662849 / Garry Walton  Agent:

POLICY I1 - Infrastructure and delivery

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then
proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

[1] Residents have been incredulous at the Council’s failure to apply infrastructure constraints to housing numbers, in response first to the Issues and Options paper and then to the 2014 draft local plan. There were 20,000 responses each time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”**

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square Km, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general "modal shift" from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every 10-15 minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus in favour of state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4 knots, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been sufficiently worked out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**POLICY I4 Green and blue infrastructure**

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
POLICY P2 – Green Belt

I OBJECT. This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)[1]

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it
contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly defeat them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

The policy states that “the general extent of the Green Belt has been retained.” This is not true.

[1] See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8244  **Respondent:** 10662849 / Garry Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**SITES**

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to a deaf audience. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

[1]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8219  **Respondent:** 10662849 / Garry Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P3 – Countryside (i.e. beyond the Green Belt)**

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why they are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt.

Apart from being a scandalous case of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8220  **Respondent:** 10662849 / Garry Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4 – Flood risk and water source protection zones

I OBJECT. Urban development on existing hard standing would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites which would not be available for housing under this policy. It is not the footprint of existing buildings that should limit future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8221  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8203  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.”[1] Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given.[2] The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.[3] In my view this is a non-policy.[1] NPPF paragraph 14.

[2] The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

[3] Including: “empowering local people to shape their surroundings… Take account of the different roles and character of different areas… protecting the Green Belts around them… recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it… Support the transition to a low carbon future… Contribute to conserving and enhancing the natural environment and reducing pollution… Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets… Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8213  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY S2 – Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.[1]

1. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

1. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.[2] The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,[3] leading to reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

1. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted.[4] But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
1. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

[1] At the time of writing, about £8 billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.

[2] This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2255  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Site 35. Proposed development at site A35 Three Farms Meadows, the former Wisley Airfield in The Draft Local Plan.
The people of Ockham helped to win the war. Will they be allowed to live in peace?

When captain ‘Mutt’ Summers (pictured left), chief test pilot for Vickers Armstrong made his emergency landing on a grassy stretch of Ockham farmland during the early stages of World War 2 he could not have guessed at the far reaching changes his discovery would bring to the local residents.
They were accustomed to walking across the green fields from Elm Corner to Ockham Church on a Sunday morning and enjoying lunch with vegetables grown in the the big field at Elm Corner.

However, the land was requisitioned in 1943 by the Ministry of Defence to make way for an airfield. Access to the public was denied, rights of way closed and four farms Stratford, Hyde, Corsair and Cuckoo together with buildings were demolished.
“Wisley Airfield” is so called because most of the land used to be in the parish of Wisley, until the reorganisation of parish boundaries in 1938. Now the airfield is totally within the civil parish of Ockham.

Following requisition in 1943 The Ministry of Defence promised and gave assurances that after the cessation of hostilities it would be returned and restored to agricultural use. It never was. The government never delivered its promise to the people.
of Ockham who surrendered land so that our country did not have to surrender to Hitler. The ‘Crichel Down Code’ decrees that land commissioned in an emergency must be offered back to the existing owners in the same condition as before. It never was. The people of Ockham who helped to fight off foreign invaders now are having to fight off foreign Cayman Island investors who seek to concrete over their historic Green Belt hamlet. Isn’t it high time, after 75 years, that the good people of Ockham, for their war time sacrifice, were given their just reward – peace.

Ockham History. Historic Ockham Village deserves special protection status because it is nationally important hamlet and should not be subsumed into a ‘new town’ It is…

1. The birthplace of the philosopher William of Ockham, famous for ‘Ockham’s Razor’.
2. The home of Ada Lovelace The worlds’ first computer programmer.
3. The site of ‘The Ockham Hoard’ a significant Bronze Age archeological find now at The British Museum.

I also continue to object to the inclusion of site A35, Three Farms Meadows in the draft Local Plan for many more reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account.
7. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. Opportunity (3) should be common to all sites and is not unique to this site
12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
14. I object to the removal of additional 3.1 ha from the green belt without any justification
15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
16. I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

17. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

18. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

22. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

27. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

28. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

29. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

30. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

31. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

32. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

33. I object to the loss of prime agricultural land that can produce around 1 million loaves of bread per year when the UK produces less than half the food it consumes.

34. I object to the council ignoring The House of Commons Environmental Audit Committee 2014-15 who warned of the dangers to child health which are recorded in the findings of this committee. Excerpt from the committee findings. "New schools, hospitals and care homes must not be built next to air pollution hotspots to help reduce the tens of thousands of deaths currently being caused by nitrogen dioxide (NO2) and particulate pollution (PM 2.5 & PM 10) every year in our cities, Existing schools next to busy roads should also be fitted with air filtration systems. Wisley/A3 is one of the biggest
pollution black-spots in the UK.

For the reasons listed above and numerous other reasons I consider this Local Plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/860  Respondent: 10663425 / Patricia Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is not appropriate to inset from the Green Belt the village of Chilworth. This village is surrounded by Areas of Great Landscape Value and Outstanding Natural Beauty which should be permanently protected to prevent urban sprawl and inappropriate development.

The area immediately around it is open countryside and the village is overlooked by beauty spots of St Martha's Hill and Newland's Corner. Furthermore, it contains the important Gunpowder Mills area which is an historic site and natural wildlife area. This whole area should therefore have special protection and there is no justification for taking it out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4061  Respondent: 10663585 / Nigel Killick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the calculation of housing need, it is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed.

I object to the housing target, it is unconstrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7580  Respondent: 10663585 / Nigel Killick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object specifically to the proposed building on Gosden hill farm. This is green belt land and separates West Clandon Village from urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6024  Respondent: 10663585 / Nigel Killick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of commercial development on brownfield sites, this is unnecessary and means building houses on green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6026  Respondent: 10663585 / Nigel Killick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
I strongly object to any increase in traffic to the surrounding areas, adding more slip roads to the A3 will only make traffic worse and increase congestion.

The main road through West Clandon is already congested with many speeding motorists and large commercial vehicles using it. Pollution will also be increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlicks Arch, West Horsley and the hogs back. All are out of proportion to the surrounding areas. None qualify for the exceptional circumstances required to take them out of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/16833  **Respondent:** 10663585 / Nigel Killick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the scale of new building throughout the borough, this is disproportionate and unjustified.

I object to all strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlicks Arch, West Horsley and the hogs back. All are out of proportion to the surrounding areas. None qualify for the exceptional circumstances required to take them out of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3533  **Respondent:** 10665473 / Angela Bourke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I would like to make an objection comment to Policy number A22 Keens Lane.

I object to the increase of proposed new homes from 140 to 150, and to the narrowness of Keen Lane to accommodate the increase of traffic, and access for the construction vehicles.

The access roads for Keens Lane, Gravetts Lane from the Aldershot Road and Tangle Lane from the main Worpleston Road are not standard width main roads either, they are too narrow to take large construction vehicles and potential extra traffic, part of Gravett's Lane goes down to single track lane due to residential parking, and the turn off for Tangle Lane from Worpleston Road is a very sharp, tight left turn. There is also flooding issues in the area.

The extra traffic to Keen Lane will also put extra pressure on roads in the immediate area, like the Aldershot Road and Worpleston Road, there would also be extra pressure on the local supply services like water, sewage, schools.
I would also like to make some general comments on the Local Plan overall. The reduction in the numbers of homes built in the plan is good but I hope not to the detriment to affordable, social housing which I have heard can be the case. I also hope plans to drastically improve our road infrastructure and local supply services will run alongside the local plan, otherwise I can see Guildford's roads being even more congested and grid locked, meaning more bad air pollution for people to breathe in.

I heard no new water reservoirs have been built for years and some local authorities are reducing the amount of water taken from the rivers, so where is the extra water demand going the come from, especially in a fairly dry year like this year? This also affects sewage, will our local water treatment plants be able to cope the extra demand? It could also mean more water pollution. We've already had a note from Affinity Water on how to conserve water. Electricity supply, coal power stations are due to be decommissioned, renewables are increasing but will they be enough to cover the extra demand, and Nuclear, the new power station is still years from being up and running?

Just food for thought, please take care of our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1172  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1173  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to:

0 failure to correct for errors in the historical data for international migration flows,

0 issues with the way it considers students and affordability and

0 Flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/2154  **Respondent:** 10667073 / Trudi Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to: It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from...
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, 62215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/2155 **Respondent:** 10667073 / Trudi Harris **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
15. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (BS). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that, with this site being added at the 11th hour, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking 8f would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4537  Respondent: 10667073 / Trudi Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy 03)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4529  Respondent: 10667073 / Trudi Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4531 Respondent: 10667073 / Trudi Harris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, 82 and 88) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4534 Respondent: 10667073 / Trudi Harris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I OBJECT to the loss of rural employment (Policy ES)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Gartick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4557  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in-pri An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4555  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4556  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4540  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4544  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4547  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4550  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4526  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBCs Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4527   Respondent: 10667073 / Trudi Harris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/4523 **Respondent:** 10667073 / Trudi Harris **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID:</th>
<th>PSLPP16/4525</th>
<th>Respondent:</th>
<th>10667073 / Trudi Harris</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
2. I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverl An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/612  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/465  Respondent: 10668897 / Mary Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:
I object to the lack of transparency displayed by the GBC in the calculation of the number of houses required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the plan proposing that the majority of new houses to be built will be built on The Green Belt. My understanding is that over 70% of the proposed houses will be built on Green Belt land rather than Brownfield land. This is in direct contradiction to Government Policy. I therefore object to the continued inclusion in the plan of the Three Farms Meadow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3781  Respondent: 10668897 / Mary Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3901  Respondent: 10669057 / Yvonnes Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to record my objections to the following items:-

The Horsleys being removed from Green Belt as 'the exceptional circumstances' required have not been demonstrated.

Changes to boundaries of the Settlement boundaries.

The proposals to build the additional 533 houses is totally unrealistic without schools, medical facilities, roads and car parks being extended and there is no scope for most of this.

Development on the former Wisley Airfield. The development would cause an enormous impact on the Horsleys bringing so much more traffic into the already overloaded and narrow roads. Also the lack of drainage would cause even more traffic congestion. We have currently an increasing number of vehicles that are too large, this can only result in more accidents and damage occurring.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the proposed development of 2,000 homes at Gosden Hill, which is currently in the Green Belt and in direct contravention of Central Government's commitment to the protection of the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the proposed development of 2,000 homes at the Wisley Airfield site, which in currently in the Green Belt and in direct contravention of Central Government's commitment to the protection of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6658  Respondent: 10670529 / Jennifer McIndoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposed development at Garlick's Arch as I understand that this is a flood plain. Send Marsh has had serious flooding in the past causing extreme damage to many homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6660  Respondent: 10670529 / Jennifer McIndoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the 4 way on/off ramp at Burnt Common. This will increase traffic travelling through Send and West Clandon trying to access the A3. West Clandon is particularly dangerous as the road is narrow and with many bends. Lorries sometimes mount the pavement to pass one another. This is a worry for parents accessing the school on foot or in their cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6665  Respondent: 10670529 / Jennifer McIndoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
I object to the proposed development of 40 houses and 2 travellers pitches at Send Hill because of the restricted access to the site and I understand that the subsoil of the proposed site contains unsafe landfill waste.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14001  Respondent: 10670529 / Jennifer McIndoe  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

I object to the lack of immediate provision for new schools

I object to the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14000  Respondent: 10670529 / Jennifer McIndoe  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to all erosion of the Green Belt

I object to any "in-setting" (ie removal) of any Send, Ripley, Wisley and Clandon from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the limited consultation period.</td>
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<td>I object to the last minute inclusion of new sites with less than two weeks notice.</td>
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<td>1. I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2638  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. How is this going to be funded?

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. How is this going to be addressed?

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2639  **Respondent:** 10672417 / Matthew Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition, there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2640  **Respondent:** 10672417 / Matthew Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved and negatively impact on air quality and the health and
safety of pedestrians and cyclists and increase noise pollution. This Plan does not address the needs of local communities or the Borough in this regard.

There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5922  **Respondent:** 10672417 / Matthew Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5918  **Respondent:** 10672417 / Matthew Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5919  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the location for new employment floor space at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc,B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5920  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years.

These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I object. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help private providers market local touri This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object (POLICY H1- Homes for all)

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim is necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5936  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 - Rural Exception Homes

I object. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5924  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. There is the local school with young children walking along the road on a Monday to Friday basis, which is dangerous with the current level of traffic prior to any increased traffic that would result from further housing on the proposed scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied? In summary the health and safety of existing communities are detrimentally impacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at over capacity levels during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport.

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I totally get that Surrey is the 2nd wealthiest County after London and that the Council are hellbent on making Surrey an economic epicentre of growth and development.

As a SME owner in my mid 40s I am grateful of the opportunities that are available to me and my family living in West Clandon and working in East Horsley.

I do feel that there should be some appropriate, sensitive, practical and well thought out development in the Borough of Guildford. However I am strongly opposed to the approach taken by removing the green belt and building some spurious number of houses without much consideration of the ramifications to the people who have chosen to live here and paid a premium to do so.

I strongly believe that greater effort and vision should be applied to finding sites that might suit a more exciting form of development, flats don't always need to be 1 bed, they could be 3 bed family units!

The other issue is the impact that more development will have on an already creaking infrastructure. I appreciate that infrastructure can only be afforded on the back of development but why not design the infrastructure first and then go to developers to see could facilitate it.

I do not envy you but greater vision is needed to resolve the issue of the economic growth in the South East.

Good luck

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area {HMA}: the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight onto to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4474  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4475  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2905  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/559   Respondent: 10672417 / Matthew Kalupka   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2133   Respondent: 10677665 / Clare McCann   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Before making my comments on the local plan I have endeavored to inform myself and I have just stood and listened to Councilors Spooner and Furness for two hours and sadly nothing they said convinced me that they have the people of Send's interests at heart.

The councillors are supposed to represent us but they seem positively enthusiastic to accept the SHMA figure of 693 houses per year without challenging the number or making the process transparent to those who wish to challenge the process. I object to this lack of transparency.

They seem happy to build over greenbelt rather than use brownfield sites. For example they have recently allowed a furniture shop to go ahead on the site of the old fire station -why? This was an ideal site for flats and people who work in Guildford could walk into town. There seems to be a presumption that we need ever more retail in Guildford but most of the residents of the borough would, I would guess, not want the town to go on increasing in size. I object to town centre brownfield sites going for retail or industrial use instead of meeting the housing shortage. I work in the local Citizens Advice and I know there is a shortage of housing for people on low incomes who do not own cars and therefore are better housed near the town centre.

Students also need to be housed on or near the university, ACM etc and flats for them would help free up other accommodation for local residents -perhaps the council should be thinking of that rather than building over greenbelt. Also priority should be given to sheltered housing which allows older residents to leave larger homes and again free up residential space.

Now we come to more specific objections•.

OBJECTIONS RETRANSPORT IN RELATION TO PROPOSED DEVELOPMENT IN SEND

The councilors admitted that the road infrastructure of the area is at breaking point but all they can offer Send is a million and half over 10 years for unspecified improvements to the road through Send. That road leads to a mini roundabout at Old Woking which cannot cope now, let alone increased traffic from all the new development proposed.

Policy A44 The proposed development on Send Hill will add to the problem -already horrendous at the Send Road end during school drop off and pick up time and positively life threatening at the Potters Lane end.

Policy A42 More traffic will be generated by the Tannery Lane development. This will have to join Send Road in the village as the road is too narrow to make it safe or sensible to leave via Ripley. Send Road is grid locked most mornings and cannot be widened as there are houses both sides, as well as the aforementioned constriction at Old Woking.

Policy A43 However these developments are as nothing to the new Garlick’s Arch development which was slipped into the plan at the last moment. The land has been ‘gifted’ to the council in return for a massive development of 400 houses and a strategic employment site -by a developer, whose name, unbelievably, Councilor Spooner could not remember! The council gain land to put in a four way junction with the A3 which is supposed to be some sort of magic bullet - however this development is going to generate huge amounts of new traffic. This traffic will have to be absorbed in and around the already clogged roads of Burnt Common, Send and West Clandon.

The A3 is a road that is at saturation point and we are offered the possibility of a tunnel at some point in the future to create relief and Councilor Furness says we need the new junction to enable the tunnel. However surely we are putting the cart before the horse as we need the tunnel to be approved and funded first before we have any necessity for the new junction. Once again it is the unnamed developer who is driving the plan.

• OBJECTIONS RE OTHER INFRASTRUCTURE ISSUES RELATING TO PROPOSED DEVELOPMENT IN SEND

The new residents will require school places but there is no provision for new school places. The redevelopment of St Bedes does not envisage an increased intake as far as I am aware. In any event the secondary schools are also going to require enlarging to cope.

Our village medical centre is already under strain and it is increasingly hard to get an appointment - this too will be exacerbated by this huge increase in the population.
• OTHER OBJECTIONS RELATING TO PROPOSED DEVELOPMENT IN SEND

Policy A44 Send Hill - development this development is in the wrong place. The large field on Send Hill is one of the few remaining large open spaces. It is a glorious place to walk in the summer as the skylarks sing overhead. If there is a need for 2 traveler sites, surely they should not be put along a narrow road on a site which is said to be polluted. No one is keen to accept travellers but they are citizens too and need to be housed – I accept that, but why not put the sites in close to Ewbanks at the Burnt Common roundabout where they won't have to go up Send Hill. In fact the whole Send Hill development would be better placed there.

Policy A42 Tannery Lane - the council have already approved a marina that is not wanted by local people and that will add to traffic. The road is a narrow country lane and not suited to 40 new houses, quite apart from the destruction of open land.

Policy A43 Garlick Arch - this site will require the greatest destruction of greenbelt -the cutting down of ancient woodland and the likelihood of upsetting the water table. Flooding in Send Marsh has been mitigated by work at Send Dip but locals, more knowledgeable than I, feel that building and tarmacking over a large area at Garlick's Arch may well create new flooding problems.

OBJECTIONS RE OTHER PROPOSED DEVELOPMENTS IN THE AREA

The council turned down the development at Wisley but have not had the courage to take this site out of the plan - one has to ask why? It continues to be the case that we are NOT ALLOWED to know who the developers are -which is outrageous. How can local people believe that nothing underhand or corrupt is not going on if we do not know who is behind the development. Councillor Spooner claims he does not know who they are -well, either he is not telling the truth or he should be striving to find out on behalf of us all. A new town at Wisley would change the whole area and lead to ribbon development all the way to Guildford -Ripley -Garlick's Arch -Gosden Farm- Burpham etc.

OBJECTION TO THE DESTRUCTION OF THE GREENBELT

Once the greenbelt has gone it has gone forever. By taking the villages out of the greenbelt then there is no defence to ever greater development within the settlement boundary - and it seems the council can move the boundary of the settlement at will. It seems curious that some land near Councillor Spooner's constituency is apparently being put back into greenbelt, while Send (who dared to vote for some independent councillors) are being disproportionately hit. What are we to think?

I hope the planning inspector will look into all aspects of how this plan was drawn up, as well as the sites in the plan itself. I am not a Luddite and I accept there has to be some building but it should be done sensitively and only when need is proved. Tonight we were told the local population figures are fairly stable in Guildford so why are we going headlong towards Greater Guildford with developers calling the shots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/47   Respondent: 10677665 / Clare McCann   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have written in the past objecting to the disproportionate development being planned for Send and I gather that despite receiving over 10,000 objections, the new plan continues to ‘target’ Send and that we are only ‘allowed’ to comment on changes. Proposal A42 Clockbarn Nursery has an increased density of housing -up a third even though it has been pointed out repeatedly that Tannery lane is not suitable for an increase in traffic as it is narrow, with poor sight lines meaning it is often hard to see on-coming traffic. In addition to the traffic issue there is the problem of local services which are at full capacity now and cannot sustain a substantial increase in the village population -there seems to be no mention of school places, doctors etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:***

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**Comment ID:** pslp172/48  **Respondent:** 10677665 / Clare McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I understand further to your plan to despoil this area of ancient woodland with 400 houses on Green Belt, you have now added 8 travelling/show people pitches without any real justification. The local plan HI policy states that ‘Gypsy, Traveller or Travelling Showpeople accommodation should be provided on development sites of 500 homes or more while there remains an identified need’ - so why is Send being allocated 2 traveller pitches as well as these 8 travelling showpeople plots (once again Send is being disproportionally targeted). Traditionally when the funfair comes to Ripley the showpeople park on the Green for the week (in late October) and then leave to move to Guildford for Bonfire Night -so where is the identifiable need?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/49  **Respondent:** 10677665 / Clare McCann  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

By moving the proposed employment floorspace from the Garlick's Arch site to here, one is tempted to feel that the developers, who hope to cash in on the new housing, feel that it will make more money if it is not near industrial development. There has also been a subtle but noticeable change of wording from up o 70u00sq to a min mum o 700 s ~ m with a 1 otent1al fo more So there is no guarantee this won't increase. Has the need for this industrial development been demonstrated? Surely it will only create more traffic and demand for services and housing in an area that can't sustain this
development on top of the new housing. Industrial development should be going away from the south-east - isn't that the whole point of HS2 and the northern powerhouse initiative.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2655  Respondent: 10678465 / M.J Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  ◦ The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  ◦ The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  ◦ The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  ◦ The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

2. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

3. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations. There should be a clear statement as to how this has been allowed to happen.

5. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

6. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

7. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. What is being done in this regard?

8. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

9. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building. All the arguments with regard to conservation in the area apply.

12. I object that the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

13. Reliance on Woking Station is unsustainable. Woking is already at capacity in terms of the station itself and nearby parking.

14. Additional bus services would compromise the safety of those cycling and walking in the area.

15. Its location to the M25 at J10 and the A3 means overloading one of the most congested junctions in SE England.

16. I object to the application of new housing on the old Wisley Airfield on the ground that it is the least sustainable strategic site in either version primarily due to its physical location.

17. The site is further from the railway station than any other proposed site. This station has insufficient trains to deal with increased passengers and a very small car park which is already filled to capacity. There is no scope to increase the size of the car park.

18. Local roads are at capacity and increased public transport would have to negotiate over already overcrowded SRN. They would be unable to offer a reliable service.

19. Additional visitors to the RHS Wisely have not been included.

20. There is insufficient employment opportunities on the proposed site. All residents will therefore need to travel to work by public or private means.

21. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

22. I believe that opportunity (3) should be common to all sites and is not unique to this site. I object that insufficient consideration has been given to this.

23. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. What has been done in this regard?

24. I object to the removal of additional 3.1 ha from the green belt without any justification.

25. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

26. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

27. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
30. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. No reasonable explanation has been given for this.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

33. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I therefore consider that this plan is unsound and not fit for purpose and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am very concerned about the amount of housing increase proposed and the infringements onto the current green belt, which will result in a significant increase in traffic and pollution (air and noise) in the area and the road through West Clandon becoming even busier and resulting in traffic accidents, more injuries and deaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13752  Respondent: 10682529 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once the green spaces are taken, they can never be brought back and our country will forever be poorer and a less pleasant place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13748  Respondent: 10682529 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13755  Respondent: 10682529 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not understand why the government cannot encourage more development and extra housing outside of the South East of England to ‘spread the load’ and discourage more and more people wanting to come to London and the South East. This should also ease the price and affordability of housing in the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2221  Respondent: 10683457 / Margaret Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.3 A42 Clockbarn Nursery

I wish to object to this development. While this a brownfield site, my objection lies in the road access to the site. The junction of Tannery Road and Send Road is extremely narrow and will continue to be used by large lorries supplying the Tannery Business site. The road becomes single track beyond the Tannery. In addition to the narrowness many cars are parked close to the junction limiting site lines and causing difficulties in manoeuvrings (see figure 1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2219  Respondent: 10683457 / Margaret Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.1 A43 Land at Garlick’s Arch

I object to this site. It was not identified until June 2016 as a potential site for development. It had previously been rejected in the 2014 draft and no evidence has been produced to support the development of this site. The provision of 400 houses totally distorts the Burn Common community and is massive in addition to the population but with no addition amenities planned. There is one convenience store within walking distance. The schools and surgeries in Send and Ripley are too far to walk and in any case they are full in Send. The site contains ancient woodland of which there is very little in the parish of Send and the development has potential negative impact on this. The land is subject to flooding and the flood risk will be heightened by housing and industrial development. No case has been made for the industrial and commercial use of this site in preference to the alternative site at Burn Common which was the preferred option from the draft plan in 2014 and up to and including the May 2016. Development of this site will have negative visual impact on the A3 and for views from the south of the A3 including the North Downs. The combination of Garlick’s Arch and Gosden Farm development will significantly alter the character of Guildford from a compact to county town to a sprawling urban conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2220  Respondent: 10683457 / Margaret Bruton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.2 A43A Land for North Facing Slip Roads on A3 at Burnt Common

I object to this development. No necessity for this new North facing junction was identified in previous versions of the local plan. The main justification is to improve access to the proposed Wisley Airfield redevelopment. It is difficult to justify this as that site is 6 kilometres away and can only be accessed through the already stressed local roads. In addition, GBC has recently rejected the latest planning application for the Wisley Site. New infrastructure should only be approved when the final nature of the Wisley development is known. Providing a northbound A3 access at Send will have a very negative effect on the A247 which has the problems already described above. The new junction will certainly attract commercial traffic from South Woking which currently accesses the A3 via the inadequate A245 or via the narrow Newark Lane. A new Woking to A3 access road was proposed when we moved to Send in 1981 and we are still waiting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2222  Respondent: 10683457 / Margaret Bruton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.4 A44 Lands at Winds Ridge.

I object to this development. This land is unsuitable for development being land fill with active waste management still in place. The site will have a negative visual impact being clearly visible from the Wey Navigation Corridor and Potter’s Lane. Access to the site is very poor being single lane from Potters lane and very narrow from May’s Corner traffic lights with cars frequently parked restricting access.

[IMAGE 1]

Figure 1 Lorry attempting to enter Tannery Lane from Send Road

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: IMAGE 1.jpg (35 KB)

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Comment ID: PSLPP16/4799  Respondent: 10683457 / Margaret Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. Proposed developments on Sites A42, A43, A43A, A44.

I wish to object to the proposed developments on these sites. The combination of these new housing proposals gives rise to population increase of over 25%. This is a clear overdevelopment of the three settlements. The lack of infrastructure has already been noted. In particular, the A247, the main artery through Send is extremely congested. Send is a classic linear village and most of the house along the A247 were constructed before the car era and lack off-road parking facilities and inconsequence many cars are permanently parked on road. This is a source of traffic congestion with long tailbacks in the morning and evening rush hours and delays at other times when large vehicles traverse the village. The situation will be exacerbated later this year when the new St Bede’s school opens (Planning application 16/P/00033 Approved GBC 31st March 2016) as access to both infants and junior school will now be from the A247 effected doubling the number of pupils arriving in that way. While the planning application included a School Green Travel Plan to minimise car journeys to the school the mitigation measures of increased cycling and walking are difficult to implement as footpaths and cycle paths are inadequate. Public transport is not an option as no buses pass the school. Inevitably increased car use will result giving more congestion with increased risks to children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4798  Respondent: 10683457 / Margaret Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Consultation for Guildford Local Plan June 2016

I submit the following objections to proposals in the Local plan affecting the settlements of Send/ Send Marsh/ Burnt Common.

1. **Insetting Of the Send village within the green be**

I wish to object to this proposal as it makes available for development a significant number sites in addition to those specifically identified in the Local Plan. Sites such as the land behind Heath Drive and soon to be redundant ST Bede’s school buildings could be used for housing. This will significantly change the nature of the village from a rural setting to an urban environment. Furthermore, this will place additional strain on the already limited infrastructure where the village schools are full with no additional capacity. The Village Medical Centre is also full and the roads are already over capacity. Public transport is already very limited with no late evening or Sunday service. Further development in the village will visually impact the Wey Navigation Corridor, a major local and national asset.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>pslp173/231</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I applaud the statement in the” Guildford borough Proposed Submission Local Plan” that “Our new Local Plan for 2015 - 2034 is central to delivering Guildford’s vision for the future. It deals with key issues of local importance and gives direction to deliver a high quality of life in a sustainable way.”

I am pleased that the plan acknowledges that (para 2.10a) “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough’s prosperity and quality of life. Many people are attracted to Guildford by the quality of life and environment.”

As a resident of Send I must OBJECT to the changes in the plan since June 2016.

The increased development In Send in the June 2017 version of the plan will put an extra, unjustifiable pressure on the infra structure of Send.

The current version of the plan with its increased amount of development in Send does not provide the infra structure for the increased pressure on an already overstretched road network. Consequently this will certainly decrease my quality of life and also the quality of life of other residents in Send.
The increased number of houses and businesses will increase the volume of traffic and as a result will increase journey times as well as increasing the amount of pollution which the local school children will be subjected to as they walk to school (see SCC policy on walking to school).

These alterations to the 2016 version of the Local Plan are not consistent with your stated criteria for drawing up the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1735  Respondent: 10685057 / J E Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write, in the strongest terms, to object to the council altering the Urban Boundary to incorporate the land North of Salt Box Road, Worplesdon.

My reasons are:

The area is currently designated Green Belt and the Council has by a Motion passed unanimously in March 2013 to undertake the preservation of the Green Belt

The area is immediately adjacent to Whitmoor Common an SSSI, SPA and LNR and would have a detrimental effect on ecology and wildlife.

The open nature of Worplesdon should be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/104  Respondent: 10692833 / Elizabeth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to voice my concern over the ridiculous proposals in the Local Plan.

I object wholeheartedly about the disproportionate size of various sites in our village setting. I have lived here for 25 years when Ripley was a village. We have tried hard to keep it that way but the development has been gradually increasing.

One of my main objections is to the traffic and congestion. I live on the Portsmouth Road and these days I can hardly get out of my driveway due to the continual stream of traffic. A lot of this comes through the village because there is a problem on the M25 (most days) or the A3. The proposed on/off junction for the A3 will not rectify this. The A3 is a car park everyday. I work at the school in the village and the traffic at the junction in the village is chaotic, with huge lorries trundling through all day. There is also limited parking. Therefore I object on these grounds.

I am also objecting because there is no infrastructure for all this development. When White Hart Court was built on they had to install another electric substation as the existing one could not cope. The area is prone to flash flooding, the drains cannot cope. I have photographic evidence of our driveway and land adjacent being flooded, and of the surrounding roads particularly Rose Lane, Ripley Lane and Ockham Road.

I strongly object to Ripley, Send and Clandon being removed from the Green Belt. These villages will just become a suburb of Guildford and be concreted over within a few years. No thought has gone into this at all. There is NO reason to do this and once it is done it will be too late to change it.

The roads in our villages, particularly Rose Lane and Ripley Lane are in a very poor state. Full of potholes that get repeatedly filled in then appear again. I am objecting to this plan as I feel the roads cannot sustain the amount of extra traffic and are not wide enough to cope with larger and heavier vehicles. Many have no footpaths or cycle lanes or any lighting at all.

We do not have the public transport system to cope with the extra housing. There are few buses and no local station within walking distance. There are not enough school places or medical facilities. Most people will have to rely on cars to get about so I object to Wisley Airfield site and Garlicks Arch particularly for this reason.

I doubt that anyone from Guildford Borough Council lives in this area and therefore could not care less but they should. This is an ill thought out plan that is just a knee jerk reaction to fulfilling the required housing quota. Local people will fight this tooth and nail and we will not let the developers win.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7404  Respondent: 10692833 / Elizabeth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Plan’s failure to explore or propose brown field sites for the required development. In the near vicinity to the Garlicks Arch site there is a significant surplus of land on an already developed site to the south of Burnt Common which could be developed without damage to the Green Belt and the loss of rare Ancient Woodland. It is incumbent on the Borough’s planners to identify such sites. I am very concerned about the manner in which the Garlicks Arch site was surreptitiously substituted for a brownfield development at Burnt Common at the last minute before publication.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16468  Respondent: 10692833 / Elizabeth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Riley Village, I am deeply concerned about the proposal for Ripley, Send and Clandon to be removed from the Green Belt. I object to this proposal as the risk of the London urban sprawl and the absolute need for the protection of rural Surrey, is now of paramount importance. It is beyond belief that Local Authority Planners do not immediate see the priority of such protection.

I am equally concerned that the loss of the Green Belt in these areas is simply a device to allow impediments in National Planning policy to be removed in relation to the proposed development sites at the former Wisley Airfield and Garlics Arch in Send. National policy permits the loss of the Green Belt in only exceptional circumstances. There are no such circumstances in relation to these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16469  Respondent: 10692833 / Elizabeth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object to the proposed development sites at Wisley Airfield and Garlics Arch both of which represent significant overdevelopment of Green Belt sites, disregard the availability of brown field sites and singularly fail to take account of the effect on transport infrastructure which is unsustainable.

The scheduled proposals for the Wisley site will place a wholly unacceptable weight of traffic on already congested roads in village centres and trunk road connections. Any resident who has to access the northbound A3 at peak times from Ripley or Ockham is painfully aware that the junction can barely cope at present.

The proposed size of the Wisley Development will give rise to unacceptable log-jams making viable commuting impossible.
There are no viable train connection to serve these sites and the area is already very poorly served by bus services. All transport requirements will therefore inevitably fall on the already overstretched roads. The effect of these developments on the Portsmouth Road running through Ripley and Send, which already carries a staggering volume of traffic, will be to return the road to levels of congestion which existed before the A3 Trunk Road was built.

The proposed A3 north/south junction at Burnt Common does nothing to alleviate the congestion and will simply lead to congestion where A3 traffic meets traffic on the already congested local roads. There will therefore be traffic “black spots” both to the north and south of Ripley.

I further object to the imbalance of proposed development sites which are located in the North East of the Borough. Housing needs within the Borough arise in all areas yet there are no proposals for sites to the south and west of Guildford.

Large developments of the types proposed in Wisley and Garlicks Arch are simply unsustainable. Significantly smaller developments linked to existing village envelopes, will not place stress on transport infrastructure and the amenity of the rural environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPA16/521 | Respondent: | 10695457 / Shelagh Harradine | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south) |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

With reference to your plan to change the green belt boundary in Shalford, I object to that plan for the following reasons:

The elevation of this land, which is 32 feet above King's Road, is the highest in the local area and any housing development built on it would tower over the village community facilities and the surrounding area.

Access to this land would be via Chinthurst Lane which is already an heavily congested country lane and to increase the volume of traffic would be madness.

Over 700 residents have already signed a petition objecting to the proposed settlement boundary change last year so surely the residents wishes should be respected?

This land contributes to the open character of the village and provides an attractive setting for the village's community facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/1792 | Respondent: | 10699841 / Annelise Wilkinson | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my objection to the above proposal for the following reasons.

Firstly in broad principal I believe the Green Belt is more necessary now than when first implemented as without it, there will eventually be no distinction between town and country as the urban sprawl continues unabated and our countryside is lost forever.

Secondly, in more specific terms, I object to the proposed building of over 500 houses in Horsley as the infrastructure simply cannot cope with such an increase in population. In the winter of 2014/15, in order to walk my dogs locally in Green Lane, I had to wade through raw sewage spilling out onto the road for weeks as the sewers overflowed because they could not cope. A proposed build of 120 homes nearby would obviously cause this to be a permanent and unacceptable problem. Such a large development would also adversely effect the character of the existing village, which seems to have been conveniently overlooked.

The village shops and library already have times when there are no vacant parking places, and many residents do not have access to these amenities apart from using a car.

The doctors surgery in Kingston Avenue (the only GP service in Horsley) obviously struggle to give out appointments within a reasonable length of time already, as I have rung them for an appointment quite recently only to find the soonest they could offer was in 9 days.
Ockham road north is already very difficult to drive out into or from houses alongside it due to limited vision, narrow width and bends, so any increase in traffic volume which would effectively turn it into an A road instead of a B road would make it even more dangerous.

I would like to point out that finding land on which to build is only a part of a development plan – the infrastructure must be in place to accommodate it, which isn’t the case in Horsley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/395  **Respondent:** 10701409 / Marilyn Squires  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my objection to the above proposal for the following reasons.

Firstly in broad principal I believe the Green Belt is more necessary now than when first implemented as without it, there will eventually be no distinction between town and country as the urban sprawl continues unabated and our countryside is lost forever.

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I would like to point out that finding land on which to build is only a part of a development plan – the infrastructure must be in place to accommodate it, which isn’t the case in Horsley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development a Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13442  Respondent: 10701537 / Ben Gamble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the sustainable employment policy (Policy E1)

When developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), will be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

The Garlick’s Arch site should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13443  Respondent: 10701537 / Ben Gamble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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1. I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the loss of rural employment (Policy E5)Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Many of the roads serving our villages are narrow country lanes, which are not fit for high volume of traffic or large HGVs. They already suffer from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13447  Respondent: 10701537 / Ben Gamble  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13448  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to look at improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

In deed the new junction to the A3 at Garlick’s Arch (A43a) is proposed in the second half of the Plan period, way after the anticipated timing of the development of Garlick’s Arch for housing and employment. There is no attempt to improve the infrastructure prior to development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13449  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13440  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

Brandon Lewis, the Minister of State for Housing & Planning wrote to all Members of Parliament on 7 June 2016. In the letter, which is attached, he stated that the demand for housing along will not change Green Belt boundaries.

There is a really danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages of Ripley, Send and Clandon will merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. All these factors should carry such weight that the sites at Wisley Airfield (A35) and Garlick’s Arch (A43) are excluded from the Plan.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Rather than developing Garlick’s Arch, there is just to the south of the site at Burnt Common an existing brownfield site, with surplus land that could accommodate a further development. This would be a far better and more acceptable solution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents: BrandonLewis Letter.pdf (1.9 MB)

Comment ID: PSLPP16/13441  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

The brownfield site to the south of Garlick’s Arch (A43) at Burnt Common is not at risk of flooding. This makes it an even more sensible solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13438  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by the National Planning Policy Framework.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages, including schools and doctors, will be unable to cope with the level of development proposed.

The sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the narrow roads serving the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13439  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not applying any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs to all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough. They are very much rural Wards and this will change for ever under the Plan.
Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current distribution of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

In the last five years planning consent has been granted for approximately 115 new houses in the Lovelace Ward. This alone has dramatically impacted on the character and the communities in the Ward. Over 2,400 houses are proposed in the Ward over the period of the Plan. These houses will more than double the number of houses in the Ward and will totally change it, without any consideration of what the Ward actually needs.

A neighbourhood plan is currently being drafted for the Lovelace Neighbourhood Area, which follows the boundaries of the Lovelace Ward. The Plan should be redrafted once the neighbourhood plan has been prepared to reflect the local needs.

Fundamentally, the developments proposed in the Plan do not meet the needs of the local communities and the approach adopted in the Borough Wide Strategy is wrong.

In view of the comments above it would appear logical to apply constraints in line with government policy to the development being proposed to take account of the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1672  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1671  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan
Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1674  Respondent: 10701537 / Ben Gamble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)
This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1667  Respondent: 10701537 / Ben Gamble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43)
I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch
The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1669  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.
With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1668  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposal for a Waste Management Facility in Green Belt (A58) The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43) This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** pslp171/450  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/452  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the lack of proper infrastructure planning for sites (A43 and A42)
The Foreword to the plan by Paul Spooner includes on page 5: “We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/451</th>
<th>Respondent:</th>
<th>10701537 / Ben Gamble</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td><strong>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</strong></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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<td>I object removing Send Business Park from the Green Belt (4.3.15). Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1085</th>
<th>Respondent:</th>
<th>10702561 / Emily Gamble</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong></td>
<td><strong>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</strong></td>
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<td>12. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as it is too high</td>
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<td>The Plan concludes that 693 homes a year are required by the borough, over double the previous figure of 322. As the calculations of these figures are confidential one cannot scrutinise them, which is not democratic or transparent. One assumes student numbers have been used to inflate this figure. This is disingenuous. Whilst local students are studying they will not wish to stay out in Ripley and Send but on the outskirts of Guildford in shared accommodation. Once they have graduated they will most likely leave the area. I went to Cambridge University yet few of my contemporaries live within 50 miles of Cambridge.</td>
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<td>These inflated numbers contravene the National Planning Policy Framework which allows the overall housing target to be reduced to take account of protected wildlife areas, landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to the area concerned.</td>
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<td>The visceral reaction of appalled disbelief felt by all local people in response to the proposed Plan is supported by the above legal and logistical objections, and the Plan should be abandoned in its current form.</td>
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| Comment ID: | PSLPS16/1790  | Respondent: | 10702561 / Emily Gamble  | Agent: |
12. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

The last minute removal of the Burnt Common Brownfield site and insertion of the Greenbelt Garlick’s Arch site is unacceptable. No consultation was held and residents only discovered this exchange after a council meeting on 11th May 2016.

No wildlife report has been conducted. As a local resident I am aware these areas house many wild birds, including owls and red kites, plus badgers and their setts, whose habitat will be obliterated.

Whilst it is a paradise for wildlife, the electricity pylons which pepper the site will pose a health hazard to human residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3845  Respondent: 10702561 / Emily Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

7. I object to the damage to the historic environment as a result of the scale of the proposed development

It is a violation to permanently destroy the Ancient Woodland that surrounds the Garlick’s Arch site on two sides and includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3842  Respondent: 10702561 / Emily Gamble  Agent:
5. I object to the claims made regarding sustainable employment policy

To pretend that the proposed development at Garlick’s Arch will engender significant employment opportunities is disingenuous. There is already an industrial development south of Burnt Common with brownfield land and infrastructure making it more suitable for development without the stark impact on environment and community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6. I object to the loss of rural employment

The plan will result in the loss of rural businesses and their dozens of employees by forcing them out of their premises against their will. Some of these businesses have been operating and providing employment for 30 years. This is a travesty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
struggle to accommodate existing residents and such an acute explosion of the population will have disastrous consequences for the community.

I live in Ripley and can never get a GP’s appointment for that day yet the Villages Surgery at Send are no longer booking any appointments for future days as they are too busy. One needs to phone at 8.30am to book an appointment for that day but the phone is always engaged. When one at last gets through no appointments remain and one cannot book for the next or subsequent days for routine appointments.

I have eight month old twins and a three year old and I have had to take them to the Royal Surrey Hospital A&E for problems as I have been unable to see a doctor at my local GP’s surgery.

To so massively increase the burden on this surgery as a result of the Plan would be frankly ludicrous as the surgery is already oversubscribed and this would cause a collapse of the local health system.

There are no railway stations near the sites of Wisley Airfield (A35) and Garlick’s Arch (A43) therefore residents will be reliant on motor vehicles. The local congestion though Ripley village at rush hour is already horrendous, with gridlocked traffic in both directions along the Portsmouth Road. Yet there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. The increase in pollution for my neighbours and myself will be astronomical and detrimental to our children’s health. Such an increase in noxious nitrous oxide fumes would shorten the life expectancy of all residents but I feel the disastrous effect on children’s health, with inevitable increases in asthma, is particularly irresponsible.

It would be infinitely preferable for all constituents and road users if areas such as Guildford and Woking had brownfield sites developed as a robust infrastructure already exists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure

The Plan would cause an inevitable increase in Road Traffic Accidents involving both cars and cyclists and thus the number of deaths due to R.T.As.

The congestion affecting Ripley High Street, particularly at the junction of Newark Road, will worsen and local businesses will be deleteriously affected, as will the already poor road surfaces.

Parking in Ripley is already ridiculously hard and such a gargantuan increase in the number of cars will make it impossible.

10. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure

The Plan would cause an inevitable increase in Road Traffic Accidents involving both cars and cyclists and thus the number of deaths due to R.T.As.

The congestion affecting Ripley High Street, particularly at the junction of Newark Road, will worsen and local businesses will be deleteriously affected, as will the already poor road surfaces.

Parking in Ripley is already ridiculously hard and such a gargantuan increase in the number of cars will make it impossible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3. I object to not protecting the Green Belt

The Green Belt of beautiful English countryside is a priceless jewel which once built on will be irrevocably lost forever.

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This contravenes National Planning Policy, as this requires there to be an
exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3841   Respondent: 10702561 / Emily Gamble   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding

The soil in the Ripley area is heavy clay and prone to flooding. The Environment Agency’s flood map has identified the site at Garlick’s Arch (A43) as being a Flood Zone 3, the highest risk category and unsuitable for building. The Council has arbitrarily downgraded this unbiased Environmental Assessment, no doubt to attempt to ease progress of the Plan. The area is near my home in Kiln Lane, Ripley and I know that it floods annually and drainage is inhibited by the clay soil.

It is most concerning that this risk has been erroneously downgraded and ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3839   Respondent: 10702561 / Emily Gamble   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Borough Wide Strategy

The plan will cause obliteration and devastation of the beautiful countryside between the villages and cause them to coalesce into an urban sprawl. The 13,860 houses are disproportionately allocated to development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. These precious English villages will be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.
17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3021  Respondent: 10703745 / Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/595  Respondent: 10703745 / Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1028  Respondent: 10705377 / Elizabeth Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I had a very interesting piece of paper through my letterbox from dandara regarding where new development takes place.

According to them they already have land next to the A246, which whilst green belt, is surrounded by urban influences including existing housing and the main road to Guildford from the east. It would be a sensible and proportionate addition to the village.

Why hasn't SCC or GBC considered this? Surely it would be much better for everyone concerned to have small and medium scale sites, in order to provide the Council with an opportunity to deliver a more equitable spread of development across the Borough?

This would limit the loss of the most important green belt land. More research needs to be done to bring to the fore, the lower quality green belt land and countryside that should be identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2779  Respondent: 10705377 / Elizabeth Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My husband Lawson Carr and I, Elizabeth Carr am objecting to the increased number of houses proposed north of Keens Lane. We objected initially on the lower number and our objections still stand.

140 and certainly 150 dwellings will add at least 300 residents, and that is a low estimate, the larger properties are likely to have 3 or 4 residents and at least 2 cars.

• This will increase congestion on the surrounding, already congested, routes
• This will increase problems around any exit onto Keens Lane
• This will increase the footfall on Whitmoor Common, putting this protected area under more strain.

hThis will increase the potential accident rate on the blind corner on Keens Lane

This will decrease the evidence of wildlife, critical to our area - it is common to see deer, rabbits, and rare birds.

'eOur house [Attachment redacted due to statements containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] was purchased because it was semi-rural and we do not wish for any of the above certainties to come true should this plan go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/170</th>
<th>Respondent: 10706849 / S J Savage</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I write to support the decision to remove site A46 and site A47 from the proposed plans.

This decision will mean that undue pressure is not placed upon the roads which are unable to cope at present with the morning and evening, work related, movement of traffic. Any increase of traffic in Westwood Lane should be discouraged because of children walking to school. Indeed the current speed limits are regularly exceeded and this aspect should be monitored and addressed as soon as possible.

Normandy also suffers from poor water pressure at times, flooding at others and any building upon fields would exacerbate the problems.

The doctors in the area are fully stretched and need no further increase of their work load.

A major concern is that the designated areas are on Greenbelt lands which were granted this status to protect boundaries, to provide access to countryside walks and to create a habitat for wildlife. The building on Greenbelt land should never be considered. It is detrimental to people and all living things.

I love living in semi-rural Normandy and do not want our lovely village spoiled for all the residents by the lowering of the standards of services by spreading them too thinly, and by the increasing of air pollution because of further traffic.

I trust that these concerns will be heard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1041</th>
<th>Respondent: 10707457 / A J Grist</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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</table>
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:
- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/203  Respondent: 10707457 / A J Grist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4485  Respondent: 10708513 / John Carroll  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a resident of East Horsley I strongly object to much of the Proposed Submission Local Plan in respect to East and West Horsley.

I question the Borough housing targets set out in Policy S2. I therefore accordingly object to Policy H2.

I object to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I also object to the proposed East Horsley boundary change which cannot be justified.

I object to the proposal to designate roads south of the A246 as being within the identified boundary of East Horsley village and to allow limited infilling within this area.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the current needs of East Horsley is already a serious deficiency in the Proposed Submission Local Plan and I object to the infrastructure proposals on these grounds. I also strongly object to the proposals for the East Horsley infrastructure in that they do not meet the stated objective of providing a timely infrastructure to support the proposed developments.

I consider that the proposed western movement of the East Horsley settlement boundary needed to bring site A39 within the settlement area as unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt, as such and with no ‘very special circumstances’ to justify housing development on it I object to Policy A39.

I strongly object to the site allocation policies A37, A38, A40 and A41.

These four policy sites are all located within the Green Belt. One is a partially brownfield development but the other three sites are all used for agriculture and all sit within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants to justify these settlement boundary movements appear to me unfounded and in no way meet the requirements of the NPPF.

These boundary movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries must be reconsidered.

These proposals appear contrary to the principles of the Metropolitan Green Belt.

I also strongly object to Policy A35.

I object to the proposal to to remove Wisley Airfield from the Green Belt and the enormity of the proposed development of it, due to the strain it will place on existing infrastructure and amenity.

I object to Policy E2 insofar as it omits to confer "public transport interchange" status on Effingham Junction Station without good reason.

Obviously I appear to strongly object to many aspects of to the Proposed Submission Local Plan which although I appreciate has had much time spent compiling and revising, still fails to address the ‘objective’ in a manner acceptable to the majority of residents effected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: pslp172/161</th>
<th>Respondent: 10709825 / Mr &amp; Mrs P. Billington</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/7113</th>
<th>Respondent: 10712833 / Felicity O'Brien</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that the local plan needs to be reviewed to reflect the number of housing units built in Guildford over the last 5 years.

The infrastructure in the area is unable to support a development on the Keens Lane site. The roundabout at the eastern end of Keens Lane is already dangerous as drivers locally treat this roundabout as a chicane.

Worplesdon Road is already one of the worst roads in the area for traffic congestion during rush hours.

Drainage – Any hardstanding from a development west of Findlay Drive will increase the run off into Sime Close and consequentially silting up of the soakaways.

Gravetts Lane was flooded on 23rd June after the rain the night before. The foul sewers were bubbling up with the need for a clean up to be carried out.

Gas & Electricity there is insufficient power in the area requiring an upgrade to the system.
Schools, Hospitals, Doctors, Dentists would all need to be improved to support another significant development as there are already availability and access issues with all of the above without exacerbating the issues further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/278  Respondent: 10713057 / Kirsty Hurst-Worth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to you to express my dismay at yet another set of ill-considered plans to develop West Horsley village!

I'm genuinely astonished that after such fierce opposition to the last round of proposed plans a more considered approach has not been adopted as I think we all understand we have a responsibility in accepting a degree of development within the village.

But an increase of 35% in village size - come on!

On green belt land - have you lost your environmentally-friendly faculties?

With no meaningful consideration of appropriate infrastructure - this is simply lazy, slap dash and irresponsible!

Please go away, have a good talk to yourselves and come back when you have a plan which is appropriate to the character of West Horsley village!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/618  Respondent: 10713505 / John Kinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Further to the points outlined in our Parish Council's response to the Guildford Borough Council's proposal, I add the following:

1. the infrastructure for such a development is simply not there in Normandy. We have no provision or utility shops and no post office. The only garage no longer sells petrol or diesel.

1. The existing sewage system is already overloaded as evinced by recent incidents in Glaziers Lane. Some parts of the village, including my own, are not even connected to the main drainage system but have to rely on cesspits or septic tanks which have to be emptied at regular intervals at vast expense.

3 Since the demise of Vokes Ltd and its successors there is no local industry to speak of and Normandy has turned into a dormitory village, and so where are all these extra people to find employment?

4. The village is in a damp environment and parts are subject to flooding which is not helped by lack of maintenance of drainage ditches. Surface water is not adequately catered for. I have previously written a very detailed description of the topography of the area, copies of which were sent to Guildford Borough Council (which I hope has not been mislaid) and our local Member of Parliament.

1. It is difficult to obtain an appointment with a doctor at Glaziers Lane Surgery, an indication that that system is already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The access road to Send Hill from Potters Lane is a narrow single track road and not suitable for 40 houses and 2 travellers sites. This junction is treacherous with no clear vision if you are coming from Send Hill into Potters Lane. With speeding motorists using Potters Lane as a cut through to and from the A3, any additional traffic will make this junction even more hazardous. My wife and daughter narrowly missed being involved in an accident today on the bend heading from Potters Lane to the Send Hill turning – a large lorry and a Fiat 500 had been involved in an incident where the Fiat had been badly damaged by the lorry where the road is very narrow. The previous week my wife was nearly involved in a head on collision on the same bend with a lorry in the middle of the road as the lorry was too large for the narrow lane, the lorry’s tyre skid marks can be seen on the road. My daughter’s car has been damaged by a passing car coming from Send Hill, where her wing mirror was broken, and my wife has had the same experience, these are not isolated incidents as Send Hill and Potters lane are too narrow for the traffic using them. The proposed development would not be in keeping with the beautiful and peaceful surroundings of the area including the cemetery and the adjoining properties in Send Hill. I understand that the Send Hill Development was not part of any previous consultations and I am concerned about the impact of this level of development on residents and cemetery users.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/144  Respondent: 10713953 / P Smithers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I also object to the plans for the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common and Clockbarn Nursery, Tannery Lane. The infrastructure of Send Village is not able to cope with the existing daily traffic as it is, especially at peak times with commuters and school runs. Most days there is congestion along Send Road. My daughter worked in Ripley for six years and it regularly took her 50 minutes to travel from her house in Westfield to work during peak travel times. This was one of the reasons she chose to move jobs. There are no realistic alternative routes for motorists to take from Send Road and many cars chose to cut through Potters Lane to avoid sitting in traffic, many of which are large lorries who are too big for the road or speeding commuters in cars, which pose daily danger to the residents of Potters Lane, any increase in traffic will only add to the danger.

I would be grateful if you could pass my comments onto the Planning Inspector and confirm safe receipt of this email. I do hope you will take on board my feedback and the feedback of the residents of Send who very much care about the village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/143  Respondent: 10713953 / P Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Green Belt status being eroded away from Send Village. I appreciate more housing is required but there are a number of brown fill land sites in the borough on which to build.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2517  Respondent: 10713953 / P Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 houses in place of 45 homes is not in keeping with the rural area and Tannery Lane is very narrow and is not sufficiently wide enough to carry the significant increase in traffic. It is already treacherous at points along the lane and it will impact the open countryside views and will unnecessarily erode the Green Belt status of the area. The Marina development has already been given the go ahead and the area cannot cope with more building development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2518  Respondent: 10713953 / P Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch to allow for 400 homes and 6 Travelling Showpeople plots. This proposal will over-develop our village as this number of houses is unduly excessive and will erode the ancient woodland that has existed for hundreds of years. Guildford Borough Council should be protecting this area not developing it. It will join up Ripley and Send villages and will erode the Green Belt further and generate excessive traffic and block the already gridlocked roads. The area is prone to flooding and this proposal will increase the likelihood of further flood damage. There is no demand for Travelling Showpeople plots in this area, and ‘no exceptional circumstances’ exist to destroy the Green Belt status of this location. There are others areas in the Borough available for development. This area is already full to capacity, the Doctors Surgery and schools are struggling to cope with existing volumes as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2519  Respondent: 10713953 / P Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of previous objections and there is no requirement in the area for a minimum of 7,000 sq m of industrial warehousing. It will impact the small surrounding roads as the traffic will be gridlocked, the Ripley exit off the A3 in both directions is already treacherous with cars speeding through the area to cut through Send and Ripley villages. There is no demand for industrial warehousing in this area when there are warehouses available and empty in Slyfield Green which is purpose built for industrial units. It will only erode the Green Belt further and join up Ripley and Send villages unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/937  Respondent: 10713953 / P Smithers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt, Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because it is in a restricted vehicular access area along Tannery Lane from both directions and further expansion and development is not in keeping and will detract from the openness of the area. The existing infrastructure is not sufficient to cope with any increase in traffic and building development. It will seriously impact the area of outstanding building along the Wey Navigation, which my family and friends have enjoyed for many years.

My wife and I have lived in Send in excess of 24 years. I originally grew up in Send and we chose to return to the village to enjoy our retirement. We have family and friends living close by, including both my daughters and grandchildren, all of whom regularly visit us. The proposals above would considerably change the way of life in the village and surrounding area, we along with many others chose to buy in Send because of its village environment and rural setting, away from built up areas. We live in Potters Lane and are impacted every day by commuters speeding through to and from the A3, both my wife and I and are family have had our cars damaged from cars speeding past and not keeping to their lane and clipping our cars.

I appreciate more housing is required but there are a number of brown fill land sites in the Borough on which to build. I strongly object to the Green Belt status being eroded away from Send Village. I do hope you will take my comments on board along with the many other residents of Send who very much care about their village and its surroundings and who have lived in the village for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1135  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of any immediate provision for new schools or GP surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1136  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the failure of GBC to consider and address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in the housing for Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1133  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My more specific objections are:

• I object to the way GBC use the word ‘need’ in the Local Plan in place of demand when promoting the house building requirements in this area.
• I object to in the inflated and exaggerated housing “need” cited in the Local Plan of 13860 houses. The legitimacy and use of data which GBC cited was questioned – even by GBC itself. The miscalculated and misconstrued total was reviewed by the Scrutiny Committee of the council, who decided the housing number needed to be reduced. Despite this the number has now been increased.
• I object to GBC refusing to disclose their calculations in suggesting housing ‘need’ in order to allow appropriate scrutiny of the data.
• I object that GBC is proposing to go ahead with this inadequate and ‘not fit for purpose’ plan (so designated by Paul Beresford, local MP), particularly now the result of the referendum vote is in, bringing with it financial uncertainty and economic changes. Given this result GBC must acknowledge that their housing ‘need’ numbers are completely unsupportable and a re-evaluation is urgently needed. Not to do so would be the height of arrogance and foolishness. Particularly since a large proportion of the proposed ‘need’ for additional housing was based on an assumption of inward international migration. This is now so obviously unsupportable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1134  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object that GBC have failed to heed estimates and amend their proposals with regard to the proposal of building industrial space at Burnt Common. The 2015 Employment Land Needs Assessment (ELNA), indicates an 80% reduction in employment space from the 2013 ELNA carried out by GBC. Again, this figure must be further undermined by the economic uncertainties wrought by the Brexit vote.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/833  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. There simply is no evidence that the borough requires excessive development and GBC fail to identify the 'need' for this. Building on such a beautiful site will be utterly detrimental and irreversible. Such development would also cause significant impact on traffic - which has not been considered or allowed for in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/831  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to excessive building on this site and that it is still included in the Local Plan, despite GBC unanimously voting against planning in April 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to GBC retaining the proposed building at Wisley Airfield, despite their unanimously rejecting planning proposal in April. Just more evidence of their knee-jerk and unconsidered and inadequate approach to local planning and development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2075  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal to build 45 houses at Clockbarn. There is inadequate access and this would create an excessive and unsupportable increase in traffic volume. This would become more hazardous for people trying to access the main road and leave the lane. Tannery Lane is obviously unable to accommodate the volume of traffic that would result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2077  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal to build 400 houses at Garlick’s Arch. This number is not required and there is no credible evidence to suggest that it is.
- I object to development at Garlick’s Arch being proposed with only 2 weeks notice and subsequently not being subject to due process – with GBC failing to provided sufficient time for proper consultation.
- I object to GBC proposing to build on Garlick’s Arch as it is known to flood.
• I object to GBC proposing to build housing and industrial space at Garlick’s Arch because the site is covered by ancient woodland.
• I object to the proposal of building 7,000 square metres of industrial space at Garlick’s Arch. As per my comment re: building industrial space at Burnt Common, the ELNA shows a reduction of 80% in required employment space when compared to previous documentation. This is simply not required and certainly not in that location.
• I object that the existing, appropriate and available 40ha site of industrial space at Slyfield is not being used in preference to the proposed building of industrial space at Burnt Common and Garlick’s Arch.
• I object to GBC proposing to endanger sensitive and ancient woodland by building at Garlick’s Arch.
• I object to GBC proposing to build at Garlick’s Arch when it is well known to be subject to flooding and pictorial evidence of this has been submitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2072  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the new interchange this GBC proposes to be built on the A3 at Burnt Common. This would cause gridlock in our village, be detrimental to residents’ health and cause, as a consequence, increased risk of accidents and harm. The Transport Evidence used by GBC shows there will be increased congestion because Send would be used as a cut through to the A3/M25. If this went ahead Send would become gridlocked as traffic from the proposed 5850 houses at Wisley, Gosden Hill Burpham and Blackwell farm would all impact on our village and roads.
• I object that the Transport Evidence for the proposed new interchange onto the A3 at Burnt Common is incomplete and unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2073  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the proposed development at Send Hill of 40 houses. This area of beautiful Green Belt would be ruined forever. Currently it is regularly used and enjoyed by locals that I frequently encounter when walking my dogs in that area.

• I object to the proposed number of houses at Send Hill as this would result in increased traffic flow on a road that is already compromised.

• I object to the proposed number of houses at Send Hill, as it will impact on village children safely travelling to and from school. There is already congestion in the mornings and cars parked on pavements where parents are busy with drop off and pick up. Drop off will become less safe as a result of increased housing and car use.

• I object to GBC proposing to build 40 houses at Send Hill when it is documented that the subsoil contains unsafe landfill waste, currently vented. That this subsoil contains documented unsafe landfill waste is registered at GBC.

• I object to GBC’s proposal of including 2 Travellers Pitches at Send Hill. They will typically have larger vehicles and/or tow and there isn’t space to safely accommodate this kind of traffic. Building these pitches in this location will cause unnecessary risk, due to the road narrowing to a twisting single-track country road. It will also cause congestion. Locals currently avoid using that end of Send Hill due to the risk of collision when pulling out onto Potters Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object - Post Brexit - with its economic uncertainties renders all the data used for this Policy unreliable.

I object - Slyfield is an existing and well-served locality in which to contain and adequately serve industrial and commercial businesses, not the rural environment. Development here would be inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4359  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that GBC proposals for the development of Send would include the removal of much loved land by the Wey navigation and behind the school. This is most usually enjoyed by residents but also brings visitors to our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1519  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object: "Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets". The uniqueness of Guildford is the surrounding Green belt and the beautiful surrounding countryside, on which GBC is proposing to build.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1495  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

I object: "Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets". The uniqueness of Guildford is the surrounding Green belt and the beautiful surrounding countryside, on which GBC is proposing to build.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object - this comment is included above: 'Residential densities will vary dependant upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre'. If this is the case why proposing building nearly 500 houses in Send. Why propose building 70% of 13,860 houses within the Green Belt along the A3?

As with Policy 1, there is no clarity, no clear definitions provided, no framework on which to consider and make complex decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC’s lack of clarity in this policy. A clear definition of rural exception is not provided. It is written: ‘the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs, and the homes are all secured as affordable homes in perpetuity’. This is meaningless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object - GBC’s local planning is focussed on excessive building, primarily on Green Belt land, yet does not address increased traffic and its impact on the road infrastructure - which is already inadequate to address current needs, resulting in frequent congestion and poor air quality. This will only be increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1509  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - as the Green Belt forms an overwhelming proportion of the Borough the Local Plan should place its protection as the forefront of it's policies. To state: 'We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development' is patently untrue. Protecting the Green Belt is not a priority of this Local Plan.

I object - to state: ' In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated" is patently not shown in the Local Plan. GBC fails to demonstrate special circumstances and is planning excessive and very inappropriate new development in the Borough and patently failing to identify and prioritise the use of brownfield sites within urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4357  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to GBC Local Plan - Consultation, 2016

I am writing in response to the Local Plan, and wish my objections to be seen by the Planning Inspector. I have been onto the GBC website to make individual objections to the many worrying and troublesome suggestions included in the Local Plan.

In this letter I wish to express my deep concerns and objections to local issues as a resident in Send and the impact of the inappropriate and excessive development proposed in the Local Plan on our village, quality of life and future.

My greatest concerns are to do with the removal of Send and other villages from the Green Belt and the detrimental and irreversible effects this will have. Local residents have consistently campaigned against this – neighbours and other villagers I talk to are determined to do so still. This removal goes against Government guidance (National Planning Policy Framework), which states the presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC patently fail to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4358  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to GBC going against Government guidance in their proposals to build on Greenbelt land and failing to provide exceptional circumstances to justify this. Presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC patently fails to do this.
- I object to GBC proposals to build on Green belt areas whilst failing to first identify sufficient brownfield sites within urban areas.
- I object to all proposals to build on Green belt land in the borough. Urban brownfield areas could accommodate all the true and required development that is needed and such sites are close to existing transport systems and links to support such development. NO such road infrastructure exists in the villages.
- I object to GBC failing to provide a considered, appropriate local plan and future for our borough by neglecting to include the Town Centre Masterplan.
- I object to removing Send, Ripley and other villages from the Greenbelt. Our village provides a necessary, beautiful and irreplaceable buffer between Woking and Guildford.
- I object to the proposal that 70% of 13,860 houses in the plan are suggested to be located with the Green Belt along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4361  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact GBC knowingly proposes increased developments in and around the village that will exacerbate known existing flash flooding problems in the area (including the Portsmouth Road which runs alongside the Burnt Common site). I know they are aware of this because I and other residents previously submitted pictorial evidence as part of the 2014 Local Plan consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1492   Respondent: 10717985 / Alison Drennan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of clear definitions and clarity running throughout this section. There is no clarity, no clear framework proposed to enable complex and critically important decisions to be considered and decided upon. Thus this section is not a policy but a thinly veiled justification for promoting excessive and unwarranted development in the borough.

I object to GBC stating: the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

'Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'; GBC has received much evidence that decisions to move villages out of the Green Belt and to build on Green Belt land will not be advantageous, nor provide benefits.

I object to the fact that whilst the NPPF states that the presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this. GBC fails to do this. What is exceptional is GBC persisting with this proposal in the face of so much local opposition and without providing good evidence for their proposals.

I object to the favour and bias that GBC shows towards development - evidenced by their use of phrases such as 'without delay'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1493   Respondent: 10717985 / Alison Drennan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object - In the 2014 Local Plan GBC itself recognised that the legitimacy of the data they cited to build excessively numbers of houses was miscalculated and reviewed by its own Scrutiny Committee who decided the number should be reduced. Post-Brexit all projections for population growth economic growth and migration need to be reviewed, as a matter or urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to GBC failing in it’s duty to respond adequately to residents concern about the above, and failing in its duty of care under the Human Rights Act.
- I object to GBC proposing excessive development will result in a decrease in air quality and directly impact on the health and wellbeing of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/254</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I absolutely DO NOT agree that the plan, strategy and sites are based on up-to-date, relevant data or evidence.

The data used by GBC contains anomalies (e.g. base rates of housing need of students which do not provide a stable base for extrapolation) and relies on assumptions which cannot now be used (for instance rates of growth in employment and need for housing in this area). The assumption of housing need behind the SHMA for example had as a driver inward international migration. This MUST now be reviewed and reconsidered given the EU referendum result. There simply will not be such migration and therefore no need to decimate our beautiful countryside by excessive housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/255  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the idea that the evidence base and submission documents are based on up-to-date, relevant and adequate information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/256  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the suggestion that the proposed submission local plan: strategy and sites as a whole is sound.

I completely disagree that this is the case, for the following reasons:

I object because correct process has not been followed by GBC. Every major site of development in Send for instance (where I live) has been changed since the original consultation in 2014. These significant changes require another full consultation under Regulation 18, not Regulation 19 - which invalidates the whole process of "consultation" and makes a mockery of the idea that the local plan as a whole is sound.
I object because the evidence base used was faulty and unsound. The rationale behind the notion of need to build on Greenfield sites within Guildford Borough is faulty – it is based on poor data and - since the EU referendum result - unsound assumptions. For example there will not be a need to accommodate the inward movement of international migrants that was previously assumed.

I object because it proposes excessive and unjustifiable numbers of housing need. In 2014 even within the council itself it was recognised that the number suggested for housing at that time was excessively high. So this miscalculated and misconstrued total was reviewed by the Scrutiny Committee of the council, who decided the housing number needed to be reduced. Given that now even higher housing development is proposed, the current proposals are completely unsound.

I object to GBC’s fundamental confusion of housing need with housing demand. This major confusion invalidates many of their arguments for increased housing in the area and renders the local plan unsound.

I object because GBC propose building on Greenbelt land, removing villages from the Greenbelt and failing to heed Government guidance on the issue. Compelling and convincing arguments for building on Green Belt are not provided, in that no ‘special circumstances’ (NPPF) are outlined. These are required by Government guidance. This is another very significant factor undermining the soundness and fitness for purpose of the local plan. It is of note that Local MP Paul Beresford has stated that the Local Plan is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/789  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that all the proposed latest sites in Send were not included in the 2014 previous consultation. This proposal has not followed correct process or allowed for legitimate consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/790  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In conclusion, the Local Plan fails to heed previous concerns vociferously expressed by residents in the Borough, and particularly the local residents I discuss the above with here in Send. We love our village and whilst recognise there is a need for housing and some development, wish it to be based on sound and correct evidence, taking into account the Governments’ guidance not to build on Greenbelt without first exhausting brown field site options, and then only after demonstrating exceptional circumstances, and taking into account impact on already straining infrastructure.

Further of course the local Plan does not take into account the dramatic result of the EU referendum – which impacts on every assumption about growth and housing need contained in it.

It is incredulous that in your role as public officers - voted for and funded by constituents, that you continue to offer laughably poor proposals for local development. Your job is to bring benefit to our lives - if your current proposals succeed it will be to detriment of our currently enjoyed and valued quality of life and on our environment. It will be undemocratic.

? Despite obvious and demonstrated concerns of local residents, you continue in your arrogant and ill considered behaviours to attempt to excessively develop our village and in your failure to protect vital and cherished natural resources.

What is more you fail to demonstrate any credible evidence of carrying out a valid appraisal of local need. Your proposals clearly do not reflect local need or interest - whose interests are you actually promoting? In the circumstances it is hard to avoid the suspicion that it is the interests of developers that are being prioritised, particularly given the late presentation of Garlick’s Arch and the A3 interchange and the funding for this being provided by those wishing to develop building at Wisley.

I would urge you to listen and provide a decent, fair and considered local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/702  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to section 5.22 of the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017, the statement that "

... 40% of housing could be delivered as affordable for the purposes of following the advice set out in the PPG as above is unreasonable. Across the country, it is clear that 40% is an unattainable figure and typically developers fail to deliver on 20% at best.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/645  Respondent: 10717985 / Alison Drennan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SMHA figures are unsound and grossly overestimate housing targets for this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/646  Respondent: 10717985 / Alison Drennan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change which is the removal of: 2.22 Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough's prosperity and quality of life. Many people are attracted to Guildford by the quality of life and environment. This places a high demand on school places and access to amenities such as open spaces. The Local and Strategic road networks, rail network and local facilities in village settlements are also facing increasing pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/655  Respondent: 10717985 / Alison Drennan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A42 change at Clockbarn Nursery, Tannery Lane

I object to the change re: an increased number of houses; this represents a disproportionate increase and GBC fail to justify it.

I object to this change as it is undemocratic - the proposed increase disregards (and indeed flies in the face of) the many objections previously made by local people.

I object because the consequences of the proposed change will further erode the Green Belt in our village.

I object because the development will impact the beautiful views that exist in this area, having a deleterious impact on our quality of life and enjoyment of our local environment.

I object because it will make the existing surface water flooding problem much worse than it already is; it is very problematic already.

I object because the infrastructure in Tannery Lane, and indeed the village, will not be able to support such an increase.

I object because there is insufficient access at the Tannery Lane/A247 Junction and the proposed change will exacerbate existing traffic congestion, making the roads less safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch, Send Marsh because:

I object to this change as it is grossly unreasonable and undemocratic in that it disregards that thousands of local people have previously objected to this policy and proposed development.

I object to development on permanent Green Belt and that GBC have failed to establish and demonstrate that exceptional circumstances exist to do so.

I object that it will defeat the purpose and role of the Green Belt and that Ripley and Send will effectively become joined up.

I object because it will cause over-development in our villages and the number of homes is excessive to demonstrated need.

I object because it will result in traffic that will further block the local roads.

I object because it will impact on infrastructure and GBC have failed to address this.

I object because it will destroy beautiful countryside and ancient woodland.
I object because existing flooding problems in the area will just become exacerbated.
I object to the inclusion of 6 Traveling Showpeople plots; there is no evidence that this is necessitated in this location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/657  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Land at Burnt Common, London Road, Policy A58**

I object to Policy A58 as, following many objections made when the development was proposed in the 2014 draft Local Plan, it was deleted. It is nonsensical to now re-introduce it.

I object because there is no justification for building industrial/warehouse development in the Green Belt when empty sites and industrial units already exist in Slyfield and at Guildford.

I object as the Policy fails to take into account that the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole Borough. This Policy suggests an ridiculous 10 hectares in Green Belt land in one location. This disproportionate and unjustifiable and flies in the face of need.

I object to the change of wording from maximum to minimum (minimum of 7,000 sq m of industrial or warehousing). As per my previous comment, there is no need for such development in this area at all and certainly not an increase to existing, discredited amounts, particularly given current economic uncertainty and a decreased demand for industrial land.

I object as infrastructure will not be able to support the increased traffic that will result.

I object as it will make small surrounding roads unsafe and cause traffic gridlock. I live on Potters Lane and currently even a nominal increase of traffic numbers causes traffic to come to a standstill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1142  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design” as this deletion weakens the policy and will not contribute to making places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1139  Respondent: 10717985 / Alison Drennan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites. These change does not allow for sufficient public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1140  Respondent: 10717985 / Alison Drennan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes in policy E4 Surrey Research Park as this is still represents excessive expansion, not supported by the findings of the Employment Land Needs Assessment 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/757  Respondent: 10717985 / Alison Drennan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
I object to the changes in this Policy as GBC used unsafe and inappropriate data on which to "support" their proposals. For instance the figures from the revised West Surrey SHMA (Strategic Housing Market assessment) are misleading and offer an inflated housing target for the Borough of Guildford, in large part because of the transient student population associated with the University. Census data takes term time address as permanent places of residence and housing needs are based on this - irrational, misleading and not in the interests of locals who live here, pay taxes here and vote for the council.

1. I object to the changes in this Policy as GBC used unsafe and inappropriate data on which to "support" their proposals. For instance the figures from the revised West Surrey SHMA (Strategic Housing Market assessment) are misleading and offer an inflated housing target for the Borough of Guildford, in large part because of the transient student population associated with the University. Census data takes term time address as permanent places of residence and housing needs are based on this - irrational, misleading and not in the interests of locals who live here, pay taxes here and vote for the council.

2. I object to changes in the Policy and with GBC’s assertion that affordable housing will be provided. Recent research from the CPRE’s (Campaign to protect Rural England) annual Green Belt Under Siege report shows that more than 70% of houses proposed for development are not expected to be ‘affordable’. It also demonstrates that just 16% of houses built on Green Belt land since 2009 outside local plans were classed as ‘affordable’.

Guildford Borough Councils proposed Local plan is a travesty of democracy and of consultation with local neighbourhoods. It clearly does not represent the views of local residents, but instead the interests of developers. I can only hope the Inspectorate will recognise this.


I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction.


I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the reclassification of an AONB to AGLV, it affords less protection and goes against the views of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Leave the AONB with their current designation.

Attached documents:

Comment ID: pslp171/74   Respondent: 10717985 / Alison Drennan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Businesss park from the Green Belt development at this choice of location is inappropriate and detracts from the openness of the area.

I object to this proposal because there in restricted access for traffic in Tannery Lane. Increased traffic that would result from development will compromise the safety of these roads and road users. It will also lead to further traffic delays and congestion in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/648   Respondent: 10717985 / Alison Drennan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the change such that Send Business Park is proposed as being inset from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/756  Respondent: 10717985 / Alison Drennan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Local Plan - Policy changes P2, Green Belt

1. I object to the changes to the policy as they disregard the the numerous objections (over 30,00) made to the 2016 plan.
2. I object to the change that is the addition of this new paragraph 1, which begins: "The Metropolitan Green Belt will continue to be protected ... against inappropriate development". In accordance with National Planning Policy the construction of new development will be considered inappropriate and will not be permitted unless exceptional circumstances can be demonstrated". As before Guildford Borough Council completely fail to demonstrate such circumstances and pay lip service to protecting the Green Belt, whilst presenting a Local Plan that proposes to degrade it and by building over it.
3. I object to the change and GBC's under-estimate that the plan would only involve the loss of "1.6%" of the borough's Green Belt. The actuality of it is when taking into account changes such as inserting, (e.g. Send Business Park) infilling and boundary extensions are accounted for the figure is nearer 7%. NO building on the Green Belt is necessitated in the Borough when the incorrect and unreliable date that GBC suggest is "housing need" is closely examined and disregarded as invalid. NO exceptional circumstances are provided by GBC to go ahead with this change. As before GBC have failed to demonstrate - using valid and reliable data - justification for this disproportionate increase in housing in our village, confusing need with demand - a basic error.
4. I object to changes in this policy as GBC have failed to "fully, appropriately and meaningfully engage with local residents and neighbourhoods" (National Planning Policy Framework NPPF 2012) as it has previously claimed it will aim to do. If this had occurred the changes in the policy would not be proposed as GBC would have taken account to the many objections voiced in the past.
5. I object to the changes re: numbers, areas etc, because building on the Green Belt does not: "preserve the openness of the Green Belt".
6. I object to the statement which states that Send and other villages are now: inset from the Green Belt. This is merely a statement of intent issued by GBC and has not been improved by an Inspector, it is therefore untrue and should not be use as a basis for planning, particularly taken into account strength of local feeling, number of objections and no exceptional circumstances being provided for development by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1138  Respondent: 10717985 / Alison Drennan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in policy P4 Flood risk and water source protection zones. It is disingenuous and a misrepresentation to state that development on existing hardstanding (e.g. Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank) creates additional risk of flooding. This policy amendment unnecessarily removes these valuable brownfield sites from the scope of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed number of traveller, travelling show people plots included in the plan, it is inconsistent, for example A50 Whittles Drive, Normandy, *The site is allocated for approximately 14 Travelling Showpeople plots ...* Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp17q/77</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
The evidence used is wholly inadequate, founded on unsound data and fails to take account of need re: actual housing units required. For instance the figures from the revised West Surrey SHMA (Strategic Housing Market assessment) are misleading and offer an inflated housing target for the Borough of Guildford, in large part because of the transient student population associated with the University. Census data takes term time address as permanent places of residence and housing needs are based on this. Most students will not stay in the area after completion of studies and require housing.

Also GBC proposes to build on Green Belt, and fails to provide evidence of exceptional or special circumstances to justify this whilst removing Brownfield sites (e.g. A4 and A34). This does not represent adequate planning nor does it provide evidence for their proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp17q/78</th>
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The 2017 Local Plan is not sound, it uses unsound data, ignoring the views and objections of local residents, and fails to provide exceptional circumstances for building on the Green Belt, and suggests wholly disproportionate an unfair development around Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp17q/79</th>
<th>Respondent: 10717985 / Alison Drennan</th>
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GBC has completely disregards the tens of thousands of complaints made by local residents with regard to disproportionate development in Send and Ripley, and to building on the Green Belt. It has also disregarded comments that point out the unsoundness of the 'evidence' GBC provides with regard to housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SHMA

I gather that the council has relied entirely on a consultants mathematical model for its projection of new houses needed. I’d like to see the basis for this model and the parameters and assumptions that informed the projection. I use statistics, data and models in my own work. Every model has it’s assumptions and weaknesses. The answers are rarely clear cut, with a range of possible outcomes. It’s a bit like predicting the weather … and we know how reliable that can be, dont we? Small changes in the underlying assumptions can make a large difference to the outcome. What sensitivity testing was done to assess the effect of varying the assumptions? What are the P10, P50 and P90 projections?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Wisley Airfield Development.

I have a strong suspicion that someone in the council saw this area on a map and thought “great, build 2,000+ houses there and we’ll easily meet the councils projected housing needs in one fell swoop. No need to do the job properly and look for all the brown field sites that could be developed first … that’s too much like hard work”. Then a developer comes along and says yes, we can build all those houses for you at Wisley, no bother (whilst rubbing his/her hands at the massive profits they’ll make in the process). Nowhere do I see that the council has demonstrated that they have really looked long and hard at the impact of such a massive development, or at the infrastructure needs it would mandate, or more critically, at potentially better and less impactful alternatives.

Further, now that we are in Brexit mode, is it the councils intention to look at how this factor might change future housing needs?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
## Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Green Belt

There are no “exceptional circumstances” that justify the proposal to remove the Horsleys from the Green belt. If nothing else, this makes a mockery of the system in place that provides necessary protection to our countryside and way of life. Neither the council or the planners have provided any valid justification for this in my opinion. It would also set a very dangerous precedent. *Expect your constituents to revolt in great numbers if this proposal goes further!!*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13880  Respondent: 10718113 / Peter Homonko  Agent:

## Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Farm Land.

Speaking of Brexit, isn’t it likely that we may need all of our farm land to provide for our future agricultural needs? Building on farm land seems to me to be a very short sighted idea.

Finally

I should add that I am not against any development of new housing at all. Clearly we do need to increase the housing stock. However, I believe that the focus at this time should be on smaller scaler development on brownfield sites, with only modest and environmentally sympathetic expansion in to (non green belt) green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1787  Respondent: 10718433 / P Mulberry  Agent:
I am writing to strongly object to the final draft local plan and my reasons are as follows.

There is little reliable evidence or justification for such a massive development in Send's Green Belt. The scale of the development proposed for Send and Ripley is excessive, unnecessary and destructive to our community and Green Belt. There is no justification for the additional houses nor the proposed industrial development of 7,000 sq.m. at Garlick's Arch. Even with the proposed interchange on to the A3 at Burnt Common the whole area will be gridlocked. At the present time any problem at the M25/A3 interchange Send and Ripley becomes gridlocked. The whole Plan is a disaster waiting to happen. It goes against the principles of community planning and is no more than a green light to developers, backed by Guildford Borough Council, to carve up rural Surrey.

The well established policies of the Green Belt is to protect open spaces, prevent encroachment into the countryside and stopping linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads.

Additional points I wish to add are as follows:

There is no requirement for the scale of development proposed. Surrey already has the largest population per square mile in the UK and should not increase.

This plan does not take flooding into account and we all know that this is a problem for residents. I look forward to hearing that you have a revised sensible and thoughtful local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/588</th>
<th>Respondent: 10718625 / Zareena Linney</th>
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I object for the following reasons Send Road where we live is too busy and the number of vehicle would be increase the proposals put too much strain on infrastructure that is already too stretched, swell as building in the surrounding area proposed of Burpham and Wisley the roads, infrastructure services won’t take it, Send road is already gridlock and cause cracks and damage to our property due to cars and lorries.

So two main objections damage to greenbelt and wildlife and greenspace and infrastructure with roads and services.

Sends future depends on you

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/587</th>
<th>Respondent: 10718625 / Zareena Linney</th>
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Re I would like this objections to be seen by an Inspector.

I object to building proposals for Send and anymore development of housing in the area. Send provides essential greenbelt land for animals and wildlife which should be protected, it lies between Guildford and Woking and these are two large towns so these green spaces and preserving them are important.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID:  pslp172/1661</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Therefore i object to the Policy A42 change at Clockbarn in Tannery lane because it is a third more home then the original proposal, Tannery lane itself is very narrow and very prone to flooding, beside the gridlock and pollution you will be causing on the already congested roads, and also impacting on the open countryside to impacts of pollution and building. It puts a strain on the infrastructure when no planning, extra traffic causes traffic to our houses</td>
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<td>I object to the Policy A43 change at Garlicks Arch, Where there are the &quot;exceptional circumstances&quot;?that you need to build on ancient woodland, the area is currently a flood zone, it lays in the green belt, you will be causing congestion for our roads even more. There is no evidence that the travelling show people want to go there.</td>
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I object to Policy A58 at Burnt Common. It was already deleted from the 2014 draft because of objections. Slyfield still has empty sites and units, you again are willing to put aside the green belt for your own gain damaging the environment and wildlife, when industrial sites shows a reduction in need. More traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/447  Respondent: 10718625 / Zareena Linney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly I object to the Green belt policy 2 at paragraph 4.3.15, i.e. to inset Send Business park from the Green Belt, there is restricted access in Tannery lane, both ways and further expansion would harm the outstanding countryside, through pollution and building. Affects the countryside and the beautiful wet navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1281  Respondent: 10718753 / Jean Saunders  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Send Village being removed from the Green Belt. The fact that it is in the Green Belt, is the reason we brought our house here.

I object to the building of 45 houses at Clockbarn Nursery, as traffic from tannery lane is already a problem.

With interference to Garlick's Arch, the building of houses there plus 1000 sq m of industrial space I wish to object this as it will ass to the traffic problem we already have. I wish to object this as it will add to the traffic problem we already have. I wish to object to the new interchange with the A3 at Burnt Common as this will also bring heavy traffic through Send.

I watch large vehicles mount pavements outside our house from my kitchen window. Because of this cars along Send Road tend to park up on the pavements. We have many cyclists using these pavements. This tends to make a problem for pedestrians trying to walk to shops and the Villages medical centre. I would like to have confirmation that this letter has been received.
Comment ID:  pslp172/77  Respondent:  10719233 / Martin O'Donohue  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Clockburn Nursery increase in size in respect of the additional traffic which it will cause, combined with traffic to and from Send Business Park plus the Marina to be built resulting in chaos trying to exit and enter Tannery Lane from Send Road the problems currently encountered with Artic`s delivering to the Business Park.

We object to Send Business Park being removed from the greenbelt it`s bad enough now the traffic is a major problem the area looks a shambles do we have live like this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:

Comment ID:  PSLPA16/793  Respondent:  10719297 / Stewart Fenton  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the local plan being based on extremely dubious housing needs figures coming out of the SHMA. The complete lack of transparency in how the figures are obtained is quick frankly disgraceful. How can Guildford Borough Council possibly stand by these figures when they have no idea what assumptions were made in their preparation?

I object to the local plan on the basis that the calculations for housing needs must now be obsolete as they would have been prepared on the assumption that the UK would remain in the European Union. The Brexit vote to leave the EU has directly resulted in substantial value being wiped off property development firms. This is strong evidence that the markets are expecting a major reduction in the need for future property development in the UK.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In respect to the Send Hill proposed development site (A44):

I object to the proposal in the local plan on the grounds that the proposed site has previously been used as a land fill site with unknown materials buried there. Any disturbance could lead to health hazards to current and future occupants of Send Hill.

I object to the proposal in the local plan on the grounds that access from Potters lane is via a single track lane, totally unsuited to anything but light vehicles. The steep single lane hill at the junction is in permanent shade during winter months and is frequently sheeted in ice resulting from run off throughout night and day for prolonged periods. The idea of a travellers site with attendant towing of large loads is of major concern on safety grounds.

I object to the proposal in the local plan on the grounds that the site is in the greenbelt. Furthermore, it is not even within the existing Send village boundary, so even the outrageous idea of insetting greenbelt villages does not lend any justification to developing the site.

I object to the proposal in the local plan on the grounds that the proposed scale of developments in Send would increase the stress already placed on the local services and further increase traffic congestion that is already a daily problem for Send residents.

I object to the proposal in the local plan on the grounds that it would detrimentally impact Send's existing village identity.

I object to the proposal in the local plan on the grounds that the proposed site is not large enough for the proposed use.

I object to the proposal in the local plan on the grounds that Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In respect to the Guildford Local Plan in general:

I object to the local plan on the grounds that the greenbelt has not been afforded the protection it deserves. We have a duty to protect it, but the local plan only pays it lip service. There is no attempt to use it as a constraint when establishing the borough's housing needs, despite government guidance that it can and should be.

The greenbelt is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Building on it will lead to an irreversible loss of:
- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. Policy A44.1.9 ha Land west of winds ridge and Send Hill. This site is new and was not included in regulation 18 draft and has not been consulted upon previously. This will cause additional dangerous road traffic due to the very narrow width single track local roads. This area around Potters Lane is already a highly dangerous road accident area and the extra housing etc will only add to this resulting serious road death accidents. Will you be able to live with this as persons making decisions resulting in death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/2582  Respondent: 10719937 / John & Jean Rudder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to the proposed development in Normandy, on the following grounds:

The roads here cannot take anymore traffic, it can take an hour to get to Guildford in the peak times.

The pollution this development would cause is a serious matter.

The loss of habitat to the wildlife, those fields are home to numerous animals and insects.

The loss of our green open spaces, we bought our home here in Normandy to live in a semi rural location as did all the other residents who are opposed to this development.

There is absolutely no need for another secondary school, we are served by Kings college, county school and bellfields schools.

I urge you to please consider the opinions of all the residents in Normandy who are so opposed to the detrimental changes this development would bring. Normandy is totally unsuitable for any further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2837  Respondent: 10719937 / John & Jean Rudder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to register my objection to the proposed development here in Normandy.

We moved here to live in a semi rural location, with green open spaces to enjoy. This development would destroy that and blight the lives of many residents who also wish to live in a semi rural location.

The threat to the wildlife is unthinkable, where would they all go?

The infra structure cannot possibly cope with any further traffic, the roads around here are gridlocked. We are at full capacity.

The pollution to our village and the risk to our health. 1000 homes would be likely to bring 2000 cars.

Guildford has several schools, there is absolutely no need for a secondary school to be built here.

Please listen to those who live here, we do not want to be part of an urban sprawl.

Yours faithfully

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5015  Respondent: 10719937 / John & Jean Rudder  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>I OBJECT TO NO CONFIRMATION FOR ALLEGED HOUSING NEED NOS.</strong></td>
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<td><strong>I OBJECT TO NEW DEVELOPMENT SITE AT GARLICKS ARCH NOT INCLUDING IN REG.18 DRAFT, PERMANETLY PROTECTED AS GREEN BELT BY NPPF PUBLIC CONSERVATION OF ANCIENT C16 WOODLAND WOULD SUGGEST IF 7000sqm INDUSTRIAL SPACE IS NEEDED BUILD IT ON THE BROWNFIELD SITE AR SLYFIELD.</strong></td>
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<td><strong>I OBJECT TO POLICY A44 SITE WEST OF WINDS RIDGE &amp; SEND HILL TO BUILD 40 HOUSES &amp; 2 TRAVELLERS PITCHES ON SITE CONTAINING DOCUMENTED UNSAFE LANDFILL WASTE &amp; WITH INSUFFICIENT ACCESS FROM SINGLE TRACK.</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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I OBJECT TO FURTHER INDUSTRIAL SPACE AT BURNT COMMON AFTER THE 80% REDUCTION IN EMPLOYMENT SPACE IN 2013

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO NO CASE FOR DISABILITY CARE OR AFFORDABLE HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS
I OBJECT TO NO IMMEDIATE PROVISION FOR DOCTORS SURGERIES
I OBJECT TO THE LACK OF ALL INFRASTRUCTURE BEFORE HOUSING & INDUSTRIAL DEVELOPMENT
I OBJECT TO THE ADDED IMPACT ON EXISTING ROADS LINKING: SEND- OLD WOKING, BURNT COMMON- RIPLEY, RIPLEY- E.CLANDON, A3-M25.
I OBJECT TO IMPROVED PUBLIC TRANSPORT FACILITIES & ACCESS NOT BEING PRIORITISED BEFORE BUILDING IS STARTED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/5179  Respondent: 10720833 / S Bryon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5176  Respondent: 10720833 / S Bryon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE
I OBJECT TO PRIORITISING GREEN BELT DEVELOPMENT OVER BROWNFIELD WHICH COULD SUPPORT 50% BUILDING
I OBJECT TO INCORRECT HANDLING OF DEVELOPMENT THROUGH REGULATION 19 INSTEAD OF REGULATION 18

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPA16/1055  **Respondent:** 10721089 / Y Beraud  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

6. I object to the proposed plan of G.B.C for Send. They have failed to provide sound evidence in the terms of employment land needs. Also the need for the housing numbers required of 13,860 homes. If the population is to grow by some 20,000 in the plan period we actually need 8,000 homes (This is based on an average of 2.5 persons per home). The Green Belt does not need to be built over, of the new homes required 50% or more could be built on Brownfield sites. The G.B.C transport assessment was not even available to the councillors for the vote taken the 24th May being published on the 6th June. Infrastructure overload has not been taken into account.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/1610  **Respondent:** 10721089 / Y Beraud  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I object to the building of 45 houses at Clockbarn Nursery because of inadequate access and traffic Tannery Lane is far too narrow and twisty to withstand any further volumes of traffic. The junction with Send Road is already hazardous for vehicles trying to join the main road. Planning has already been granted for 64 apartments and a marina in Tannery Lane both of which will generate additional traffic and even more pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/1611  **Respondent:** 10721089 / Y Beraud  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

---
4. I object to policy A.43.30ha the use of land at GARLICKS ARCH burnt Common designated for 400 houses and 7,000 sq.m of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the borough. This proposed site is new and was not included in regulation 18 draft and has not been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. THERE ARE NO EXCEPTIONAL CIRCUMSTANCES. This site has a particular conservation Sensitivity since it is covered with Ancient Woodland, trees which have existed in the 16th century and would be endangered. The proposed Industrial Development of 7,000 sq.m is simply not required since the latest employment land needs assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq.m of Industrial space it should be at Slyfield. A new 4 way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. The Send road (A247) would be gridlocked all day, Send would be the through route to Woking for traffic leaving the M25 and the A3. The proposed 2,000 houses to be built at Wisley and the 2,000 at Burpharn would make Send an impossible place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1612  Respondent: 10721089 / Y Berard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Page 1213 of 3142
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re THE FINAL DRAFT LOCAL PLAN for SEND

I WISH MY FOLLOWING COMMENTS TO BE SEEN BY THE INSPECTOR

Green Belt is defined as open space for the purpose of:
- Stopping urban sprawl to protect the character of rural communities.
- To provide clean air for outdoor activities.
- To maintain wooded areas and to provide wildlife habitat.
- To assist in safeguarding the countryside from encroachment.

Any planning for the change of use for Green Belt should demonstrate why normal planning and development would not be adequate and should show proof as to why the current plans have made the adoption of this exceptional measure necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3561  Respondent: 10721089 / Y Beraud  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to policy P2 the proposal to remove Send from the Green The use of the Green Belt Areas for development means local villages will join up and become an urban sprawl and form a Suburbia. The new local plan is to remove 15 villages from the Green Belt this includes RIPLEY and SEND. A huge development such as this will limit the ability to mitigate climate change and weather events such as flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/693  Respondent: 10721089 / Y Beraud  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the recent proposed plan of the Guildford Borough Council. Since 2014 the G.B.C have changed every Major site in the proposed development for Send, and now have added a massive New Road Junction (which will add to the congestion that is already being experienced on the A3 and local roads, cyclists and pedestrians will suffer, environmental health will suffer through increased air pollution as well increased noise and light pollution).

In the proposed plan of 2014 there was provision for 430 houses, this was reduced to 185 in April of 2016, I now note the number has increased to the proposed plan of 2014.

These significant changes require another full consultation under regulation 18 and not the short cut of regulation 19 which the G.B.C are trying to get away with.

THIS INVALIDATES THE WHOLE PROCESS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note I wish to object to Travellers Plots on this site. The access for such large vehicles would mean major road re-structure and also additional roads which would only add to the current grid lock, pollution noise and stress being experienced by local residents and commuters.

Added to which the roads are not maintained in good order now meaning additional roads would suffer the same plight in years to come. No proven demand.

I object to 400 homes being built at Garlick's Arch as this would mean another thousand vehicles accessing the local roads again causing grid lock, pollution noise and stress.

I object to this development as it will combine the villages of Send and Ripley into one large urban sprawl without any proven "exceptional circumstances" necessitating the use of precious Green Belt land with abundant wild life.

I object on the grounds that previous objections have clearly been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re THE FINAL DRAFT LOCAL PLAN for SEND

I WISH MY FOLLOWING COMMENTS TO BE SEEN BY THE INSPECTOR

1. I object to the recent proposed plan of the Guildford Borough Council. Since 2014 the G.B.C have changed every Major site in the proposed development for Send, and now have added a massive New Road Junction (which will add to the congestion that is already being experienced on the A3 and local roads, cyclists and pedestrians will suffer, environmental health will suffer through increased air pollution as well increased noise and light pollution). In the proposed plan of 2014 there was provision for 430 houses, this was reduced to 185 in April of 2016, I now note the number has increased to the proposed plan of 2014. These significant changes require another full consultation under regulation 18 and not the short cut of regulation 19 which the G.B.C are trying to get away with. THIS INVALIDATES THE WHOLE PROCESS.

1. I object to policy P2 the proposal to remove Send from the Green The use of the Green Belt Areas for development means local villages will join up and form a Suburbia The new local plan is to remove 15 villages from the Green Belt this includes RIPLEY and SEND. A huge development such as this will limit the ability to mitigate climate change and weather events such as flooding.

1. I object to the Building of 45 Houses at Clockbam Nursery because of inadequate access and traffic Tannery Lane is far to narrow and twisty to accommodate any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning has been granted for 64 apartments at Tannery Lane and for building a Marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic the junction is too dangerous already and will be made worse.

1. I object to policy 43.30 ha the use of land at GARLICK'S ARCH Burnt Common designated for 400 houses and 7,000 sq.m of Industrial and Warehousing. There is no need for any more houses on top of the 13,860 already proposed for the borough. This proposed site is new and was not included in regulation 18 draft and has not been consulted upon previously. Its is Green Belt permanently protected by the NPPF which prevents the merging of settlements. THERE ARE NO EXCEPTIONAL CIRCUMSTANCES. This site has a particular conservation Sensitivity since it is covered with Ancient Woodland, trees which have existed in the 16th century and would be endangered. The proposed Industrial Development of 7,000 sq.m is simply not required since the latest employment land needs assessment 2015(ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq.m of Industrial space it should be at Slyfield. A new 4 way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. The Send road (A247) would be gridlocked all day, Send would be the through route to Woking for traffic leaving the M25 and the A3. The proposed 2,000 houses to be built at Wisley and the 2,000 at Burpham would make Send an impossible place to live.

1. I object to policy 1.9 ha land west of Winds Ridge and Send Hill designated For 40 houses and 2 Travelers Pitches, this site is new and was not included in the regulation 18 draft and has not been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. Also the proposal to include 2 Travelers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.
1. I object to the proposed plan of G.B.C for Send. They have failed to provide sound evidence in the terms of employment land needs. Also the need for the housing numbers required of 13.860 homes. If the population is to grow by some 20,000 in the plan period we actually need 8,000 homes (This is based on an average of 2.5 persons per home). The Green Belt does not need to be built over, of the new homes required 50% or more could be built on Brownfield sites. The G.B.C transport assessment was not even available to the councilors for the vote taken the 24th May being published on the 61h June.

Infrastructure overload has not been taken in to account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/393  Respondent: 10721121 / L Beraud  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to INSET SEND BUSINESS PARK FROM THE GREEN BELT BECAUSE it is EFFECTIVELY AN OLD NON-CONFORMING USER IN AN AREA OF OUTSTANDING COUNTRY SIDE. There is a HIGHLY RESTRICTED VEHICULAR ACCESS ALONG TANNERY LANE IN BOTH DIRECTIONS. Further EXPANSION OR DEVELOPMENT AT THIS LOCATION DETRACTS FROM THE OPENNESS OF THE GREEN BELT AND IS INAPPROPRIATE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3033  Respondent: 10721121 / L Beraud  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Tannery Lane because the proposed increase of homes is much too much, also it ignores all the hundreds of previous objections made by local people. The traffic and access problems will increase in tannery lane and at the A247 junction also it will make an erosion of the Green Belt in our village worse, there is at present surface water flooding and this proposal will make the situation worse and also it will impact open countryside views from the the river Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to Policy A43 change at Garlick's Arch because there is no proven demand for a TRAVELLING SHOWPEOPLES PLOTS ON THIS LOCATION. This site is beautiful PERMANENT GREEN BELT and no EXCEPTIONAL CIRCUMSTANCES EXIST it is EQUISITE ANCIENT WOODLAND THAT EXISTED AT THE TIME OF ELIZABETH I. This Policy will join up the villages of Ripley and Send and will Defeat the KEY PURPOSE OF THE GREEN BELT. The land in question is subject to Frequent Flooding and is currently a Flood 2 Allocation and also is Contaminated by Lead Shot accumulated over fifty years. The Excessive Traffic that will be Generate will Block the already exceptional busy Local Roads of Send and Ripley. This POLICY IGNORES all the Thousands of Previous objections made by Local PEOPLE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to Policy A58 at Burnt Oak Common because of all the Objects made Previously, The word MINIMUM is a Change from the Previous MAXIMUM IN THE 2016 PLAN since that time there has been a DECLINE IN THE DEMAND INDUSTRIAL LAND there is no need to build INDUSTRIAL or WAREHOUSE developments in the middle of the GREEN BELT WHEN SLYFIELD and GUILDFORD STILL HAVE EMPTY SITES and INDUSTRIAL UNITS. THE 2017 EMPLOYMENT LAND NEED ASSESSMENT SHOWS A REDUCTION in DEMAND TO 3.9 HECTARES FOR INDUSTRIAL LAND for the WHOLE BOROUGH NOT A HUGE OVER ALLOCATION OF 10 HECTARES AT SEND IN THE GREEN BELT, ALSO THE IMPACT ON ALL THE SMALL SURROUNDING ROADS WILL CREATE TRAFFIC GRIDLOCK AND IT WILL JOIN UP EXISTING VILLAGES AND DEFEAT THE PURPOSE OF THE GREEN BELT.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to Policy A42 Clock Barn Nursery - 45 houses. This, together with the 63 apartments already granted planning permission at the Tannery site, would increase traffic on Tannery Lane so much. The lane is already narrow and twisting, with many blind bends, and reduced width on several stretches. It is also liable to flooding. The junction with Send Road is very difficult to negotiate and cannot be improved because of width restrictions.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent: 10721473 / David French</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>I object to Policy 43 Land at Garlick's Arch - 400 houses, industrial buildings and slip roads on and off the A3. It is ridiculous to build 400 houses between Ripley and Send. It would join up the villages and increase the traffic through them so much. Industrial buildings could be built on the Burnt Common site or at Slyfield. The proposed slip roads would bring vast numbers of cars and lorries through Send, Old Woking, Clandon and Ripley.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44 Land west of Winds Ridge and Send Hill - 40 houses. Again it is on a narrow country lane not suitable for increased traffic. The land is also contaminated by landfill. Would you want to live there?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8515  Respondent: 10721473 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to place on record my objections to your Local plan for Send. It is a rural village and greatly loved by its inhabitants for its open green spaces, its walks by the Send Navigation Canal and open fields, and for its varied mix of vegetation and flora and fauna, particularly deer, rabbits, bats, water mammals, and many varied birds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8516  Respondent: 10721473 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your plans to remove some of Send from the Green Belt which was intended to be permanent, as required by the NPPF. There are no exceptional circumstances which warrant this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1804  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high. This results in the unnecessary development of the Green Belt. The way the number of possible people coming to the area and being able to afford housing has been overestimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3538  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3534  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development at Garlick’s Arch for 400 houses because it was brought to our attention at the very last moment with only 2 weeks’ notice and without any prior consultation with the residents and is not required in terms of housing need by either the village or the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3536</th>
<th>Respondent: 10721537 / Stephen Niblett</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Should there be a credible need for this space, it should be located at Slyfield where there is already an industrial estate and there is a 40ha site available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/3537</th>
<th>Respondent: 10721537 / Stephen Niblett</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to the development at Garlick’s Arch because the site is covered in ancient woodland. Trees which existed in the 16th century would be endangered. Additionally this site is also at risk of flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3533</th>
<th>Respondent: 10721537 / Stephen Niblett</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be enormous congestion because Send would undoubtedly be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3535  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send and sorounding areas because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas which are much closer to existing transport lines.

I object to the proposed new interchange onto the A3 at Burnt Common because it would be totally disastrous for Send and the (A247 which is already gridlocked at peak time) would be gridlocked all day, making it impossible for the people already living there, to get out of their own driveways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3539  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses at Send Hill due to the subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is totally inappropriate due to the narrow width single track country road which would afford insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7814  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered for the last 30 years for Send and sorrounding areas. Existing roads are inadequate to deal with proposed housing levels.

It is very clear that the roads, doctors and schools will be unable to cope with the massive increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7809  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like my comments below to be seen by the Inspector and are taken into consideration since I have been resident of Ripley & Send since 1977 and I have seen the area worsening due to increasing traffic within the poor infrastructure in Riple and Send areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7811  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are to be built within the Green Belt land running along the A3. This will destroy the open enjoyment of the borough and produce even more accidents (currently at least one a week) on the A3 and surrounding roads including the A247 which are all already running at 200% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7810</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land (which now that we are exiting the European common market, will be needed for farmers to grow crop. The traffic generated from these houses will increase massively congestion on the A3 and surrounding roads like Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the removal of Send from the Green Belt because it helps to separate the village and surrounding country side from Woking and Guildford dense housing.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockharn Nurseries and Send Hill because it is not justified by any special circumstances as already exist a permanent site at Slydefield which doesn’t endanger the erosion of the current Green Belt.
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<th>Comment ID: PSLPP16/7812</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the complete failure/ lack of will/enthusiasm of GBC to identify sufficient brownfield sites within the urban area which should be identified/targeted first for any development. The open countryside and the Green Belt should be looked at after the availability of brownfield sites have been exhausted. I object to the failure to include the Town Centre Masterplan 2015 within the plan.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to all the proposed sites in Send put forward by the council because they were not included in the previous consultation in 2014. Also unlike the rest of the borough, Send residents have not been properly consulted and all its sites have been changed substantially.</td>
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<th>Comment ID: PSLPA16/1774</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed plan for Send does not take account of what local residents, most of whom seem to support the presumption against building in the Green Belt, want.

With many of my friends, I regularly walk long distances in and around the village. The plan proposals put at risk the beautiful countryside we enjoy, which, if Green Belt status is removed, is likely to become a congested suburb.

I further object to the proposed Local Plan in so far as Send is concerned because there is:

1. existing chronic traffic congestion,
2. substandard and only partial connections onto the main A3 and M25 roads,
3. an overloaded local road network connecting towns such as Woking and Guildford,

inadequate infrastructure including but not only schools and medical facilities, and your draft plan under consultation fails to say how any of these shortcomings will be resolved.

So far as the process under which the plan has been devised is concerned I wish to say that:

- the assumptions the plan is based on are fatally flawed,
- no exceptional circumstances justify taking land around Send out of the Green Belt,
- no evidence supports a requirement for the proposed scale of development,
- development proposals reflect artificial and ridiculously high projections of need,
- no evidence of need for extra industrial or warehousing land in Send has been tabled.

These faults render the Plan invalid.

Potentially destroying our sustainable community is unacceptable.

The Plan seems to reflect an irrational fear of unwelcome planning appeal decisions based on accusations of inadequate provision for future growth. It would be better to tackle the planning and appeals systems rather than appease the officials who operate a system that generates such problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

- I object to an expanded A3 interchange at Burnt Common,
- I object to housing and business development proposed for land described as Garlick's Arch,
- I object to housing development at Clockbarn Nursery,
- I object to housing development at Send Hill,

all of these sites being unsuitable and in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7695  Respondent: 10721601 / Vivienne Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt
- I object to removal of Ripley from the Green Belt

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my 19 September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Our infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:
- I object to an expanded A3 interchange at Burnt Common,
- I object to housing and business development proposed for land described as Garlick's Arch,
- I object to housing development at Clockbarn Nursery,
- I object to housing development at Send Hill,

all of these sites being unsuitable and in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9123  **Respondent:** 10721601 / Vivienne Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment. Please confirm receipt of this letter and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt
- I object to removal of Ripley from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1255  **Respondent:** 10721601 / Vivienne Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents: [Document.pdf](#) (248 KB)**
The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

"This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough".

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my 19 September 2014 letter in respect of certain sites then earmarked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
MP response - guidforddraftplan.2014.09.21.pdf (4.4 MB)
• Clockbarn, Tannery Lane Policy A42- an increase to 60 additional dwellings will worsen traffic problems and damage our green belt,
• Garlick's Arch, Send Marsh Policy A43- 400 dwellings and 6 traveller plots are not appropriate in the green belt,
• Burnt Common, Policy A 58- industrial/warehouse development in the green belt isn’t needed or appropriate,
• Green Belt Policy 2 (para 4.3.15)- inset of Send Business Park is an inappropriate green belt intrusion.

Each of these changes would increase traffic, spoil the countryside and defeat the green belt protection carefully husbanded for 75 years.

I fully support the Save Send Acton Group’s propositions in their attached commentary leaflets.

Sir Paul Beresford our Mole Valley MP has said of the plan process:

'This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough'.

Sir Paul’s commentary applies to the revised plan; his observations seem to be ignored.

Infrastructure in Send, Ripley, Send Marsh and Clandon being already massively overloaded, small disruptions cause gridlock over much of our essentially rural roads network so please also note that I still object to:

• an expanded A3 interchange at Burnt Common,
• housing and business development proposed for Garlick's Arch,
• housing development at Clockbarn Nursery,
• housing development at Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4408  Respondent: 10722049 / Richard Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/4409  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)**

   The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

   The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/8069  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in locations that simply cannot sustain the increase in traffic that will result from these developments. None of these sites is close to a mainline railway station and it is quite simply a fallacy to believe that the residents of these proposed settlements will walk or cycle to work. Any increase in the bus services will do no more than add to the existing traffic mayhem. New residents will have few options but to be reliant on motor vehicles. For these reasons, consideration must be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from severe congestion during extended rush hour periods and the Council has woefully failed to address the problem of through traffic from London and the South competing with local Guildford traffic on the A3 as it passes through the Town. The additional vehicle traffic that these proposals will generate will lead to ever worsening congestion, safety issues for pedestrians and increased danger for cyclists, particularly those from outside the Borough who now regularly cycle on the Olympic route for pleasure in ever increasing numbers. Residents, health and safety and the environment will all suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. **I OBJECT** to the Gosden Hill development being in the Local Plan.

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. How is this going to be funded?

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. How is this going to be addressed?

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36% or 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of this development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/8072  Respondent:  10722049 / Richard Smith  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved and negatively impact on air quality and the health and safety of pedestrians and cyclists and increase noise pollution.

This Plan does not address the needs of local communities or the Borough in this regard.

There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

It appears that the historic nature of Guildford Town itself has somehow taken precedence over the historic nature of the villages, hamlets and wooded areas that surround it. I object most strongly to this. If the residents of Guildford Town really want to attract new business into the Town and wish to grow the Town into a larger urban area then that expansion must be concentrated on the Town itself and not shoved out to the Green Belt and imposed on those that live there.

In particular, Ripley is an historic village and a conservation area. Removing this village from the Green Belt will remove that protection and leave it open to further ad hoc development. Likewise, the proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1).

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td>1. I OBJECT to the location of new employment floor space at Garlick’s Arch – Site A43 (Policy E2)</td>
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<td>The Policy states that:-</td>
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<td>“Where net additional floorspace exceeding 200 sq m or 25% of the existing office/R&amp;D floorspace is proposed (whichever is the lower) in the redevelopment or extension of a building in locations other than those set out above, it will need to be demonstrated that there are:</td>
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<td>• no sites available in the locations set out above</td>
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<td>• there is a demonstrated need, and</td>
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<td>• the site is or will be made accessible by sustainable modes of transport.”</td>
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<tr>
<td>There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
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<tr>
<td>There is no demonstrable need and the proposed site will create a traffic nightmare for the residents of Ripley, Burnt Common and Send Marsh.</td>
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<tr>
<td>To be precise, it fails on all counts.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td>1. I OBJECT to the loss of rural employment (Policy E5)</td>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ</td>
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dozens of people; none of whom want to leave their premises. The Plan does not promote rural employment; on the contrary it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17918  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT to this Trojan horse policy. (Policy H3 – Rural Exception Homes)**

   It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

   The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17916  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT to this policy on the grounds that the ‘all’ appears to appear all but the people living in the rural communities surrounding Guildford Town (POLICY H1 – Homes for all)**

   Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim is necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17917  **Respondent:** 10722049 / Richard Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I OBJECT to this Trojan horse policy. (Policy H3 – Rural Exception Homes)

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT to the congestion that this development will cause to the local village roads and the lack of existing road infrastructure (Policy I1)**

   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the use of the old Portsmouth Road generally as a ‘rat run’ when congestion at the M25 junction blocks the A3 bypass as it does frequently. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads and nor does it provide a coherent strategy for enabling through traffic to pass without becoming ensnared in local Guildford traffic.

   At the present time, Guildford Council appears to be unable to even maintain the existing road infrastructure, which is in appalling condition, and it is therefore difficult to see where the funds will come from for the major investment in road improvements, bypasses and upgraded junctions that will be required to achieve the proposed Local Plan.

   Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time.

   With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

   Many of the narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in these roads becoming ever more dangerous for pedestrians.

   The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk of injury to the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. There is the local school with young children walking along the road on a Monday to Friday basis, which is dangerous with the current level of traffic prior to any increased traffic that would result from further housing on the proposed scale.

   I therefore OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the congestion that the proposed developments will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce the existing congestion during the Plan period. Currently, Highways England has no plans to improve the A3 before 2020. I have considerable concerns that the development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will take place before any improvements are made to the trunk road network. The A3 & M25 are already at over capacity levels during peak hours and any development prior to improvement of these roads will only make the situation even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the poor air quality that the proposed developments will give rise to (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through any road improvements. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and may result in increased early deaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17907  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the failure to protect the Green Belt in accordance with Government policy (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be exceptional circumstances for the Green Belt boundaries to be altered, or for development on the Green Belt. There are no exceptional circumstances for these villages to be taken out of the Green Belt as mere housing need does not constitute a ‘special circumstance’. Land taken from the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in further urban sprawl and will result in these neighbouring villages merging into one another. The development of Guildford effectively up to the M25 will in fact be the first step in the spread of the existing urban sprawl that is London to an area outside the M25. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support the inclusion of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17908  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17905  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many respects, unnecessary. I request that my comments are shown to the Planning Inspector. I also request confirmation of receipt of these objections from Guildford Borough Council.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed is not sustainable (Policy S1). In this respect, it is a requirement of the National Planning Policy Framework that Local Planning Authorities should underpin their proposals with sustainable development.
The development of 13,860 homes during the Plan period is not achievable without significant damage to the environment; removal of land from the Greenbelt; increased pollution and a massive investment in the road system to enable through traffic to bypass Guildford Town. As presently drafted the Plan is not sustainable.

The Local Plan will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services, roads and facilities in these villages will be unable to cope with the level of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17906  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2) on the grounds that the proposed developments appear to be designed solely to meet the needs of Guildford Town rather than the needs, wishes or requirement for a peaceful life for those residents in the surrounding villages and local communities.

The Local Plan proposes 13,860 housing being developed across the borough, of which only 1,135 homes are designated for Guildford Town of the 12,578 homes listed on pages 123 to 126 of the Local Plan. In fact, of the total new homes proposed by the Local Plan, 3,800 are to be built on farmland outside the existing urban development and a further 5,670 are to be built on the Green Belt itself or in villages and communities surrounded by the Green Belt.

This belies the suggestion that these houses are being built to provide homes for those working in Guildford itself and suggests that many of these homes are being built for people who simply wish to relocate to this area or possibly for other immigrants to this borough.

In 2.3 of the Key facts about the borough, it states that “the population has risen steadily from 93,000 in 1951 to 137,183 in 2011. The population is predicted to reach 162,188 by 2033”. This figure is based on information provided by The Office for National Statistics (ONS) in 2016. However, these numbers are based on pre-Brexit data for economic and population growth, including migration. At the very least, these figures now need to be considered in light of the changed circumstances and should be revised downwards, possibly quite significantly.

As identified in Policy H1 at 4.2.3, “we have an ageing population with a significant projected growth in the over 65 year olds”. It appears unlikely that these individuals will reproduce at this stage and, as the effect of the post-war baby boom runs its course, this population is likely to diminish rather than increase.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half of those who do work here live outside the borough.

A short, half-hour commute puts the borough well within the reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West, but all lie well outside “West Surrey”. Each of these towns is well placed
to provide labour in order to meet any real increase in demand for labour in Guildford Town by use of the existing rail infrastructure without destroying the Green Belt or adding to the traffic problems and local pollution.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough through the choice of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

In summary, the borough wide strategy is poorly considered and appears to have been based either substantively or at least in part on a report prepared for the Council by Surrey Community Action, a charity that appears to be heavily conflicted in preparing a reasoned assessment of the actual needs and requirements of the borough as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Also the land is Green Belt and for some reason Send is taking on a lot of development of new homes without the amenities to support it. It is already difficult to get Doctor’s appointments and the schools are full. I don’t understand why Guildford Borough Council feels it can build on Green Belt land when many of the residents, like myself, live here due to the countryside feel of the area and the village feel of Send and Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/35  **Respondent:** 10722209 / S.K. Trammell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the new proposals being put forward for Send Village. Send should not be removed from the green belt.

I strongly object to the proposals for Garlicks Arch this being houses and industrial site. This will cause considerable problems with traffic etc. It is already bad enough. More houses mean more people and longer waits for Dr's appt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2635  **Respondent:** 10722593 / D.C. Johnson-Webb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to huge development at Garlick's Arch, Burnt Common. This is another development just slipped in without the necessary consultation. The roads around the area are already blocked during rush hour periods and they are not built to cope with the amount of heavy traffic already using them. Apart from a major junction at Burnt Common there does not appear to be any further improvement to the roads in the area. The A3 is already grid locked North and South Daily.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposed building of 40 homes and 2 travelers Pitches on land west of Winds Ridge and Send Hill. This is a land fill waste site which is currently vented there is also poor access to the site due to single track country road one end and the school the other end. Policy A44. 1.9 ha</td>
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<td>I object because no one seems to have considered how much water and sewage will be used and generated by all the properties proposed for this who le area including Ripley, Send, Wisley, Clandon. How are all these new homes and businesses to be serviced? What about Policing Fire and Ambulance services. The Dr.’s Surgery is already struggling, as is the hospital.</td>
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I am writing to object to the Local Plan 2016-06-13 and I would like my comments to be seen by the Inspector.

It would appear that far from looking after the interests of the rate payers, Guildford borough Council would ride roughshod over their interests with gay abandon.

I object to the way the council have changed the plans for Send after the original plan was put forward.

I object to various villages being removed from the Green Belt particularly Send Village policy P2

I object to the proposed building of 40 homes and 2 travellers Pitches on land west of Winds Ridge and Send Hill. This is a land fill waste site which is currently vented there is also poor access to the site due to single track country road one end and the school the other end. Policy A44. 1.9 ha ~to huge development at Garlick's Arch, Burnt Common. This is another development just slipped in without the necessary consultation. The roads around the area are already blocked during rush hour periods and they are not built to cope with the amount of heavy traffic already using them. Apart from a major junction at Burnt Common there does not appear to be any further improvement to the roads in the area. The A3 is already grid locked North and South Daily.

I object because no one seems to have considered how much water and sewage will be used and generated by all the properties proposed for this whole area including Ripley, Send, Wisley, Clandon. How are all these new homes and businesses to be serviced? What about Policing, Fire and Ambulance services. The Dr's Surgery is already struggling as is the hospital.

As council you are a disgrace ,all promises when you want our votes at election time and then a total disregard for us as you try and tear down our village communities and way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/57  Respondent: 10722593 / D.C. Johnson-Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Green Belt Policy 2 at paragraph 4.3.15 to insert send business park from the Green Belt because it is a area of outstanding countryside next to the River Wey. Again it has wey restrictions vehicular access along Tannery Lane in both directions.

I object to the total disregard to, residents views to the buildings on Green Belt land and destroy village life where the Government has pledged to preserve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy A42 change at Clockbarn Nursery Tannery Lane because you have increased the number of homes from 45 to 60.

This ignores the previous objections made by local residents. Each home will have at least two cars, the roads are lanes, where do you propose all the extra traffic will go on already congested roads? The area floods already what happens to all the extra water draining from concreted drives and roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy A43 change at Garlicks’ Arch. As it ignores all previous objections. There is no demand for travellers plots in this area. You will destroy ancient woodland which we as a county are supposed to be preserving. It is Green belt and is a flood two zone allocation. Where is all the traffic going to go.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to policy A58 Burnt common because it was deleted from the 2014 draft because of the local objection. The word minimum is a change from the previous maximum in the 2016 plan. There are empty plots in Slyfield at Guildford and demand for industrial plots is on the decline. The area is again in the Green Belt. The impact of huge heavy vehicles will destroy roads which are already in a very bad way and were never designed for the amount of heavy goods traffic already on them leave alone the extra numbers.</td>
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I object to various villages being removed from the Green Belt particularly Send Village policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane.

1) Increase of 45 houses to 60 ignoring all previous objections.
2) Each home will have at least two cars. Where will all the extra traffic go?
3) This area is floodplain with the whole area concreted over, where will the water go?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick's Arch.

1) It ignores all previous objections.
2) There is no demand for Travellers plots.
3) You will destroy Ancient woodland.
4) It is Green Belt and flood zone allocation.
5) Where will the subsequent traffic go.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp172/606  
**Respondent:** 10722689 / D.M. Johnson-Webb  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Policy A58 Burnt common;

1) It was defeated in 2014 draft.
2) The work minimum is changed to Maximum in the draft.
3) There are already plenty of industrial sites available at Slyfield at Guildford.
4) The impact of heavy good vehicles will be phenomenal on our roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: pslp171/70  
**Respondent:** 10722689 / D.M. Johnson-Webb  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Green Belt Policy 2 at paragraph 4.3.15 to inset Send Business park from the Green Belt down to the River Wey with no decent access to Tannery Lane in either direction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/2264  
**Respondent:** 10723073 / M. Perryman  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to the Council making last minute significant changes to the plan, such as the Garlick's Arch development in Send and the addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other significant changes to the 2014 plan, which require full consultation according to Regulation 18, not the limited form of Regulation 19.

We think that placing the very short six week Local Plan consultation in summer when many people take holidays is a deliberate act to minimise residents' opportunity to fully review the vast amount of documentation comprised in the Plan and make any appropriate objections if required.

I object to both these developments on the grounds that there was improper use of Regulation 18; no local consultation; that Garlick's Arch is green belt land which includes an area of ancient woodland and from personal recollection, a private burial of the late Mrs Molyneux-Child was undertaken on this land.

I object to the alteration to the A3 junction at Burnt Common as it has not been part of a full infrastructure review and consultation, and was added to the plan at the last minute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4953  Respondent: 10723073 / M. Perryman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

- Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to law, for which none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions made to green belt protection will lead to its demise, and once it is gone there is no going back. The green belt must be protected in its entirety, according to current law, as the lungs of the south east, and an area to be enjoyed by millions including tourists from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4952  Respondent: 10723073 / M. Perryman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

- Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having reviewed the Local Plan we wish to express our concern that the Council has ignored objections we and other residents made in the 2014 consultation. This shows a complete lack of consideration for the impact of such extensive development in the local area.

I object to the local plan as a whole, as the Borough has failed to provide sound evidence of the needs for much of the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4955  Respondent: 10723073 / M. Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Developers should be using the many brown-field sites identified in the Borough before any other sites are even considered.

We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.

I believe the Local Plan 2014 is flawed; lacks adequate research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using inappropriate legislation. It must be properly reviewed and consulted under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1182  Respondent: 10723169 / Alan Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new housing plans for Send for the following reasons.

The proposed building land in SEND HILL was infilled with rubbish and not suitable to build on.

The road up Send Hill is not big enough or well illuminated to cope with the increased traffic. {we have only 2 street lamps in the whole of the road from Mays corner to Potters lane].

The local amenities are already overstretched Doctors and schools etc. .

More building will make Send even more liable to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
increase of traffic, a despoliation of some beautiful countryside and the prospect of seeing ancient woodland in a conservation area destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1216  Respondent: 10723297 / G Chubb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to you to say Send will no longer be a village if all this building and road widening.

I object very strongly about building on Green Belt Land. I also object to 4 way interchange at burnt common, Send cannot take any more traffic or big lorries as it has damaged all roads through send and it is jammed with traffic most of the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/856  Respondent: 10723425 / Eileen Nolan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to building houses at site A42a Clockbam Nursery Tannery Lane. Planning permission has recently been granted for a Narrowboat basin in Tannery lane which will lead to an increase in traffic using Tannery Lane. The junction with Send Road (A247) has always been hazardous and the Papercourt Lane end of Tannery Lane is very narrow. Building houses at Clockbam Nursery will add to this problems and create too much traffic for this narrow ‘B’ classified lane.

I object to site A43 Land at Garlick's Arch, Send Marsh, Bumtcommon and Ripley and building 400 houses on this site as this site was not included in the initial consultation of the Draft Local Plan in 2014.

I object to building 693 homes per year for next 20 years (2013-2033). This figure is not sustainable for local infrastructure to scope with.

I object to building 485 homes in Send Parish. The population will increase by more than 25% leading to congestion on roads.
I object to the Draft Local Plan because no regard to new schools, additional medical or hospital facilities has been given to make this plan sustainable.

I object to removing villages from the Green Belt. I moved to my bungalow in the 1960s to live in a village and I would like Send to remain a proper village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2349  **Respondent:** 10723425 / Eileen Nolan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the increase in number of houses proposed for site A42 Clockbarn Nursery Tannery Lane. I have previously objected in 2016 to building 40 houses but this has now be increased to 60. My objections to the 2016 plan remain valid. Site A42 is not sustainable for building houses as Tannery Lane and Papercourt Lane's are narrow and cannot cope with this number of homes being built in addition to a Narrowboat Basin which has been approved and is only accessible by Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/790  **Respondent:** 10723425 / Eileen Nolan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Green Belt Policy 2, paragraph 4.3.15, insetting on the Send Business Park from the Green Belt and its designation as a strategic employment site, as this will add further pressure on to Tannery Lane and Papercourt Lane. It seems implausible that this Local Plan seeks to expand the Business Centre and development 60 homes in a small, narrow and dangerous rural lane for traffic. The junction with Send Road off Tannery Lane is also very dangerous and given a current planning application to build three story flats on the former JB motors garage site, on the corner of Tannery Lane to Send Road, the Local Plan proposals will only add to these problems.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposed Infrastructure Schedule (Appendix C). There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO the lack of immediate provision for new schools or doctors – this is just creating an additional local problem for future years. Local services such as schools and doctors are already at capacity.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the figure of 693 houses per annum in the borough being too high (Appendix D). GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/5778</th>
<th>Respondent: 10723553 / Judith Pound</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43). Garlicks Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the Draft Local Plan Infrastructure schedule does not provide for this site at all.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT TO site A43 Garlick’s Arch – the surrounding roads do not have the capacity for the associated increased traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/7549</th>
<th>Respondent: 10723553 / Judith Pound</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the damage to historic woodland as a result of proposed development – Garlick’s Arch (A43) would require the cutting down of over 80 ancient oak trees, a sign of the destruction of Surrey as, after all, the oak is our county’s symbol.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5777  Respondent: 10723553 / Judith Pound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of land for a new interchange at Burnt Common (A43a). This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7546  Respondent: 10723553 / Judith Pound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A43a the on and off ramp at Clandon – this will increase traffic problems, as more people use Ripley, Send and Clandon as a cut through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7548  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 The Talbot – this is overdevelopment in a conservation area, blatantly ignoring the values of an important conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7547  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A57 The Paddocks – this is unlawful

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11718  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5). The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (Policy I1). The existing services are overstretched now and infrastructure requirements have not been properly assessed and are inadequate to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11721  Respondent: 10723553 / Judith Pound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12). Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID:  PSLPP16/11704  Respondent:  10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2).

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43). There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. The Green Belt in this area provides an essential buffer which prevents Woking and Guildford from becoming one conurbation. It is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/16813  Respondent:  10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1)  I OBJECT TO the eradication of the local (or in fact any) Green Belt. The Green Belt has been assigned for the specific purpose of preventing urban sprawl and to protect the nature and identity of local villages, something that is highly important. Indeed the National Planning Policy Framework (NPPF) states that the construction of new buildings should be regarded as “inappropriate” for the green belt. Eradicating Green Belt is short term idiocy, ruining our country for future generations.

2)  I OBJECT TO any “in-setting” and removal of any villages from the Green Belt – this will cause the loss of identity and community of our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11708  Respondent:  10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to development in areas at risk of flooding (Policy P4). The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16815  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the development that may be at risk of flooding – this is not being adequately considered as required by National Planning Policy and furthermore such developments are likely to increase the flood risk of existing houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11702  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the local plan as the development proposed is not sustainable (Policy S1) – The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the Borough Wide Strategy (Policy S2). There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO the disproportionate amount of development in one area of the Borough – such a drastic increase in housing numbers will have significant effects on noise, traffic and pollution in the area. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice – similarly this does not allow sufficient time for consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3036  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery, Tannery Lane because it reduces the Green Belt protection of the village. The number of houses proposed is too many (an increase of a third on what was indicated before) and will cause traffic issues - the local roads are already too clogged up and not suited to additional traffic levels and Tannery Lane itself would not be able to cope with further traffic. Local residents have already strongly objected to it- this has clearly been ignored when drawing up these changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3599  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery, Tannery Lane because it reduces the Green Belt protection of the village. The number of houses proposed is too many (an increase of a third on what was indicated before) and will cause traffic issues - the local roads are already too clogged up and not suited to additional traffic levels and Tannery Lane itself would not be able to cope with further traffic. Local residents have already strongly objected to it- this has clearly been ignored when drawing up these changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3037  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick's Arch because it is blatant destruction of Green Belt land, where there are no exceptional circumstances for this development to be allowed. It will mean that the villages of Ripley and Send are virtually joined up, which goes against the whole purpose of the Green Belt, which is supposed to be retained. The number of houses proposed is excessive and it will create massive levels of traffic that the roads cannot cope with (particularly with the ever increasing incidents on the A3 that cause traffic from there to divert to our local roads). The huge numbers of objections already made by local people have clearly not been listened to. Also this area floods easily and this would be made worse by building on it as a great deal of natural soakaway ability would be lost and in addition the land is contaminated with lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3600  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick’s Arch because it is blatant destruction of Green Belt land, where there are no exceptional circumstances for this development to be allowed. It will mean that the villages of Ripley and Send are virtually joined up, which goes against the whole purpose of the Green Belt, which is supposed to be retained. The number of houses proposed is excessive and it will create massive levels of traffic that the roads cannot cope with (particularly with the ever increasing incidents on the A3 that cause traffic from there to divert to our local roads). The huge numbers of objections already made by local people have clearly not been listened to. Also this area floods easily and this would be made worse by building on it as a great deal of natural soakaway ability would be lost and in addition the land is contaminated with lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3038  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy A58 at Burnt Common because it will increase traffic volumes to unacceptable levels and was previously rejected because of the number of local objections - so should not be included anyway. The word "minimum" seems like a very devious change from the previous wording of 'maximum' (how much building is going to be allowed?), especially since there is now less demand for industrial land than when 2016 Plan was drawn up. In any event I don't see the need for additional commercial developments in what is clearly a residential/rural area, in the Green Belt, especially when there are empty sites in Slyfield for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3601  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I object to Policy A58 at Burnt Common because it will increase traffic volumes to unacceptable levels and was previously rejected because of the number of local objections - so should not be included anyway. The word “minimum” seems like a very devious change from the previous wording of ‘maximum’ (how much building is going to be allowed?), especially since there is now less demand for industrial land than when 2016 Plan was drawn up. In any event I don’t see the need for additional commercial developments in what is clearly a residential/rural area, in the Green Belt, especially when there are empty sites in Slyfield for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1389  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I object to Policy A58 at Burnt Common because it will increase traffic volumes to unacceptable levels and was previously rejected because of the number of local objections - so should not be included anyway. The word “minimum” seems like a very devious change from the previous wording of ‘maximum’ (how much building is going to be allowed?), especially since there is now less demand for industrial land than when 2016 Plan was drawn up. In any event I don’t see the need for additional commercial developments in what is clearly a residential/rural area, in the Green Belt, especially when there are empty sites in Slyfield for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy P2 Clause 4.3.15 — This is a pretty stretch of the River Wey and should remain protected within the Green Belt. Tannery Lane cannot withstand more traffic; it is too narrow and the area is unsuitable for further expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1775  Respondent: 10723553 / Judith Pound  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 10724769 / P. Broughton</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. It was a very late inclusion into the 2016 plan. No prior consultation was held with the residents of Send Marsh. This will increase the village by 25% and is not needed.

I object that ancient woodland dating back to the 16th century will be removed. How can you even contemplate cutting these down!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available and where developers are anxious to create this type of building.

I object that 4 businesses employing a number of people will be forced off the land against their will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal to build a 4 way interchange onto the A3 at Burnt Common in order to facilitate this development and other nearby developments. This would be disastrous for the local area. Commuters would be drawn to this area and further congest an area that is already badly congested with traffic. It will mean that the narrow Send Road (A247) will be gridlocked all day as would most surrounding roads. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, and the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3200  Respondent: 10724769 / P. Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6973  Respondent: 10724769 / P. Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the attractive open country side which is part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging of towns and settlements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6970  Respondent: 10724769 / P. Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that no explanation or planning has been given to the impact on the infrastructure i.e. roads, schools, dentists, doctors, congestion, and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send, Send Marsh and Ripley.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Green Belt status being removed from Send, Send Marsh, Ripley and the Clandons. The effect will be that we will become part of the urban sprawl of Woking. The Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6971  Respondent: 10724769 / P. Broughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that the building will be on a site that regularly floods. Will this push the problem further down into the village? I live in Greyfriars Road. If this development causes my house to flood I will sue the Council for any damage incurred plus the devaluation of the property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6969  Respondent: 10724769 / P. Broughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send, Ripley, Send Marsh, Clandon and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. None of these areas have a decent bus service and therefore new homes will rely upon cars for transport adding to existing congestion.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1065  Respondent: 10724769 / P. Broughton  Agent:
I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I request a confirmation by email from GBC that all of the objections made above are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object to the Local Plan affecting Send on the following grounds:

1. **I OBJECT** to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

2. **I OBJECT** to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

3. **I OBJECT** to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

4. **I OBJECT** to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

5. **I OBJECT** to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

6. **I OBJECT** to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

7. **I OBJECT** to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

8. **I OBJECT** to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

9. **I OBJECT** to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

Please ensure my objections are shown to the Planning Inspector and also provide confirmation that this objection has been received.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to GBC no having stuck to the rules; for example the proposed 430 houses to be built in 2014 went down to 185 in April 2016 and has just gone up again to 485. There should be another full consultation under Regulation 18 not using a shortcut of Regulation 19. The process is in invalidated by this.
2. The Employment Land Needs assessed first in 2013 and later in 2015 showed a reduction in employment space of 80%. This shows industrial space at Burnt Common is no longer needed and I object strongly that GBC say the requirement is still high
3. I also object to GBC exaggerating the number of houses needed to be built
4. I object to no sign of consideration of increased and improved infrastructure – in fact GBC’s traffic assessment was not available even for the councillors when they cast their votes on 24th
5. I object to the Green Belt being built over especially in Send, which is a buffer between Woking and Guildford. The green spots of land are precious for people and wildlife. Green Belt is permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances
6. I object to a new 4 way interchange onto the A3 at Burnt Common. Send is frequently gridlocked now. This wouldn’t be an improvement. It would be singularly inappropriate to even consider this
7. I object to land west of Winds Ridge and Send Hill being considered as being suitable for 40 new homes and 2 travellers pitches. This site is new and not included in the Regulation 18 draft. It has not been consulted on previously,
8. I object to this land being even considered as the land is permanent Green Belt. This land is beautiful and can only be approached on very narrow country lanes, which are already overloaded with traffic.
9. I object to land being dug up which although beautiful to look at and enjoy contains a variant of unsafe landfill waste. For safety’s sake – leave it alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1318  Respondent: 10724897 / Hilary Sewter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change because:

- Shows an increase of 15 houses on original 45.
- The housing demand number in the Local Plan has dropped by 39 houses per annum from 2018 – 2034. Despite this Send’s contribution has increased with no justification.
- It is an increase of 33% more and that is too much.
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction

ABIDE BY ORIGINAL AND AGREED DOCUMENT IN ORDER TO BE LEGALLY COMPLIANT AND WITH REGARD TO ALL THE LOCAL SUBMISSIONS AND OBJECTIONS.
Policy A42 pages 241-2 in neither sound nor does it comply with the Duty to Co-operate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

ABIDE BY ORIGINAL AND AGREED DOCUMENT IN ORDER TO BE LEGALLY COMPLIANT AND WITH REGARD TO ALL THE LOCAL SUBMISSIONS AND OBJECTIONS. Policy A42 pages 241-2 in neither sound nor does it comply with the Duty to Co-operate.

**Attached documents:**

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**Comment ID:** pslp172/1319  **Respondent:** 10724897 / Hilary Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this Policy A43 at Garlick’s Arch because:

- The Local Plan H1 states that “Gipsy, Traveller or Travelling Showpeople accommodation should be provided on development sites of 500 houses or more whilst there remains an identified need”. Send has been disproportionately allocated 2 traveller pitches as well as all 8 showpeople plots, identified as needed in the borough until 2034. The developments of over 1500 houses at Gosden Hill and Wisley are only allocated 8 pitches apiece during the same period.
- This Policy ignores all the thousands of previous objections made by local people.
- The area is currently a floodZone 2 allocation and really is subject to frequent flooding.
- It will generate excessive traffic that will gridlock the local roads of Send and Ripley.

Abide by the already agreed Policy A43 page 144

The proposed changes to the agreed Policy are not legally compliant, neither are they sound and nor do they comply with the duty to co-operate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Abide by the already agreed Policy A43 page 144

The proposed changes to the agreed Policy are not legally compliant, neither are they sound and nor do they comply with the duty to co-operate.

**Attached documents:**

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**Comment ID:** pslp172/1320  **Respondent:** 10724897 / Hilary Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )
I object to Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word “minimum” is change from the previous “maximum”, in the 2016 plan and since that time there has been a decline in the demand for industrial land.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the WHOLE BOROUGH not an enormous OVER ALLOCATION of 10 HECTARES at Send in the GREEN BELT

ABIDE BY THE ALREADY AGREED POLICY A58 page 144

This policy is not legally compliant, or sound and does not comply with the duty to co-operate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**ABIDE BY THE ALREADY AGREED POLICY A58 page 144**

This policy is not legally compliant, or sound and does not comply with the duty to co-operate

**Attached documents:**

**Comment ID:** pslp171/3506  **Respondent:** 10724897 / Hilary Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing demand number in the Local Plan H1 has dropped by 39 houses per annum from 2018 to 2034. Despite this Send’s contribution has been increased with no justification. The Local Plan H1 policy states that “Gipsy, Traveller of Travelling Showpeople accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need”. The Send allocation is 2 traveller pitches a 8 showpeople plots. The developments at Gosden Hill and Wisley are only allocated 8 pitches apiece until 2034, during the same period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp17q/44  **Respondent:** 10724897 / Hilary Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The overwhelming sense of non-co-operation is exemplified by the re-submission of the Policy A43 Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley; namely this was rejected by around 30,000 people, thrown-out (apparently) but now has been re-submitted.

DUTY TO CO-OPERATE DOES NOT EQUATE WITH THIS ACTION

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Also much of the proposal is woodland which should be protected by you

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object also to the overdevelopment of land at burnt common 400 houses and 7000sq m of industry and warehousing this is unnecessary over development also it is alongside the very busy and noisy A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the proposed 4 way interchange on the A3 at burnt common. This would be disastrous for Send and Ripley and would add to the destruction of the area. We have lived in Send for 30 years and realise some change is necessary but what GBC is proposing will ruin instead of enhancing the whole area.

This is a serious matter

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on the grounds that the roads are not capable of taking the traffic as they already get gridlocked morning and evening the school capacity is not there the Doctors surgery is already impossible to park in front of the shops etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8613  Respondent: 10725345 / T. Sharman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of thought and consideration to the local needs such as the over development of housing and industrial use which is far and above what is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1215  Respondent: 10725345 / T. Sharman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disregard of GBC and its attitude towards planning regulations and lack of consultation with relative bodies including parish councils in Send and Ripley of which they have shown no respect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1219  Respondent: 10725537 / D. Warriner  Agent: 

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of immediate provision of Doctors Surgeries</td>
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<tr>
<td>I object to the A43 Garlick's Arch. Has anyone considered the traffic problems this would be.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the A43a ramp at Clandon, this would increase traffic in Ripley</td>
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<td>I object to the site on the A45 behind the Talbat</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the A57 The Paddocks</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the on off ramp at Burnt Common this would cause more traffic then Ripley can cope with.</td>
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<td>What about infrastructure improvements to the local roads</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/4841  Respondent: 10725537 / D. Warriner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On reading all of the changes that you are proposing
I object to the losing of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4843  Respondent: 10725537 / D. Warriner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of development in one area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2684  Respondent: 10725633 / K. Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I request that the following comments be shown to the Planning Inspector.

The Government gave us the Green Belt to protect from planning, to save our wildlife and protect trees. I object to any planning application that would take this away from us. We do not want Guildford and Woking joined together.

I object to building 400 houses at Garlicks Arch, this is ancient woodland. The impact of additional traffic would be horrendous as it is already difficult and dangerous to access the A3.

I object to the development of 40 houses and 2 travellers pitches at Send Hill. This is a beautiful site opposite a peaceful cemetery. It is mainly a single traffic road and one often has to stop to let another car through. It is also unsafe landfill waste.

I object to a new interchange with the A3 at Burnt common, getting into Guildford is already gridlocked at certain times of the day and night. Living here you already here the A3 noise we dont want anymore.

In general there is not enough infrastructure to cope with xxxx amount of people.

Personally, I find it difficult enough to exit Sandfields into Send Hill, when the parents are dropping off and picking up children at St. Bede's school.

We want to keep our village a village, and not have developers make it into a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1211  Respondent: 10725729 / Annie Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Some of my children have been looking forward to returning to the Borough of Guildford to raise their families. They now feel that if this madness is to be allowed they will not.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. I also object strongly to the following.

I object to all the Proposed sites in send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2209  Respondent: 10725729 / Annie Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
- I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/ M25.
- I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4778  **Respondent:** 10725729 / Annie Hotson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
- I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
- I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
- I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.
- I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are understood. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to Policy A42. You have ignored all previous objections and increased the numbers of dwellings to be built. The traffic in Send is already unmanageable at peak hours. This will worsen and our air quality will get even worse. Send Doctors and schools cannot be expected to maintain a good service for the increase in numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy A58. You have ignored all previous objections and increased the numbers of dwellings to be built. The traffic in Send is already unmanageable at peak hours. This will worsen and our air quality will get even worse. Send Doctors and schools cannot be expected to maintain a good service for the increase in numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A58. There is no call for industrial buildings. So many empty at Slyfield. Cannot understand why this is even being considered. We had a large office building built along Send Road. Has now had to be turned into flats as office space was not needed. The same will happen with warehouses. Who researches the need for these building?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Green Belt Policy 2 at paragraph 4.3.15 There will be such a traffic problem, Tannery Lane is just that. A LANE. We already have such a problem with traffic that all this makes us think that the people that came up with this Plan and its changes have not even come and looked at the sites that they are planning on ruining.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. I also object strongly to the following.

I object to all the Proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPS16/2208  **Respondent:** 10725793 / Ken Hotson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
- I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/ M25.
- I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

**Comment ID:** PSLPP16/4774  **Respondent:** 10725793 / Ken Hotson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually
- I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
- I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4765  Respondent: 10725793 / Ken Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/661  Respondent: 10725793 / Ken Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the revised Local plan Policy A42: A43:A58:Green belt policy 2 paragraph 4.3.15

My reason are that Send is a village and needs to remain that way, the increase from 45 to 60 dwellings in policy A42 is unfair and has ignored all the previous objections made by our local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/663  Respondent: 10725793 / Ken Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58

There is no need to build industrial warehouses, Guildford Borough has so many unused sites and warehouses. There is no demand for them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/75  Respondent: 10725793 / Ken Hotson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2

Development at this location is just not practicable as the roads are not made for this kind of traffic.

There are many reasons why Send and Ripley should not have to lose their green belt and to increase in size so drastically, but all of those reasons were submitted in our objection to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

**Policy A42**

I write to object to the above policy because of the increase in the number of houses intended for this site. Rather than listen to the hundreds of objections put to you last year that the number was too many, you have chosen to increase the number to 60. This shows you are really not listening. Increased traffic at the crossroads with the A247, particularly at busy times when children are walking alone or being walked to and from the local schools will make for a dangerous situation. Parking is already busy round that junction and additional traffic will create a gratuitous situation for accidents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

**Policy A43**

I write to object to plans in the above policy because again you have not listened to the hundreds of objections put to you last year, and you have increased the number of houses and included six sites for travelling showpeople. You have shown no evidence of the need for these sites on a beautiful Green Belt location and where you are required to show exceptional circumstances. This is gross over development of our village with an excessive number of homes for a village. There is beautiful ancient woodland at the site which has been there since the time of Elizabeth 1 and will join up Ripley and Send thereby defeating the purpose of the Green Belt. An additional 400 houses will cripple the roads around Ripley and Send and contaminate surrounding homes with noxious fumes from congested traffic. I am informed that there is lead shot accumulated over 50 years at the site which, as a parent, I would not want my children to live with.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58

I object to the above policy for the following reasons:

It was deleted from the 2014 draft because of all the objections but now you have chosen not only to reintroduce it but to change the stated maximum square footage to minimum: another example showing you neither listen nor care about local objection. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have vacant sites and industrial units, particularly in view of the fact that there is a decreasing demand for industrial land.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt. Heavy traffic associated with industrial development will again contaminate yet further the already bad air from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/597  Respondent: 10726369 / A. Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether.

I object to the proposal to inset Send Business Park from the Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside, adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion of development at this location detracts from the openness of the Green Belt and is inappropriate.

[I am appalled that Guildford Borough Council's Local Plan 2017 is a clear failure of proper planning process.] Instead of making any real attempt to mitigate and amend the plan, Guildford appears to have shouted down our objections and refused to alter its proposals to take account of those objections. Allowing for the fact that we need more houses, Send has been targeted disproportionately for development. Pollution kills twice as many people in Britain than the US and 64 times as many as in Sweden, according to the World Health Organisation. I want to do my best to protect my village from an unfair imposition of toxins from over development and destruction of the lungs of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change of Policy A42 Tannery Lane, Send. (Notification that the plan should be increased to building of 60 homes)

• This would be totally disproportionate to the original notification of 45 homes, and an increase of 33%. I have objected to the earlier proposal anyway, the location of this site (in my opinion) is not even suitable to 45 homes. 10 maybe acceptable. This narrow lane is recognized locally as one of the remaining country lanes in Send. It has been in place for hundreds of years It has little infrastructure in place, is narrow road and not suited to any increase of traffic whatsoever
• Further down the lane, (which has no passing places at all) is a Trading Estate used by commercial vehicles. The building of a Marina on the River Wey is now in progress. As time goes on, this will also contribute to an increase in heavy vehicles using the lane.
• It would appear that the hundreds of previous objections by local people have been totally ignored.
• Should 60 houses be constructed (and excepting that most households now have more than one vehicle), it would raise traffic level to an excess amount attempting to join the A247 at peak times. Should the developers agree to pay for a traffic light controlled junction as a 'sweetener', consideration must be given to the fact that there is already traffic lights at the junction with Send Road and Send Barnes Lane. This would add to further traffic disruption (which is bad enough at the present time (the A247 being the main link road between the A3 and Woking)
• Pollution by car fumes would be substantially increased by queuing traffic.
• Also please bear in mind the safety of children attending Send First School and using the foot paths in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the Policy A43 change at Garlick's Arch
• This also ignores the thousands of previous objections made by local people
• There is no proven demand for 'Travelling Showpeople Plots'
• It is sited on ancient woodland going back to Elizabethan Times
• It is a flood zone 2 allocation, and very prone to flooding in the winier months
• There will be an increase of an estimated 1000 vehicles trying to access the A3 and the A247. This increase in traffic
  would be linked to the proposed building plan for Wisley Airfield (600 homes +} creating a massive increase is the volume
  of traffic using the A3.
• Has any consideration been given to the number of fatal and serious accidents occurring regularly on the A3. If we were
  looking at the same amount of murders in the area what would be the result

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1224  Respondent: 10726497 / David Ian Ness  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to Policy change A58 Burnt Common
• It was deleted from the 2014 draft because of all the local objections made earlier. How has the earlier decision been
  changed?
• The wording of 'minimum' development has been changed to 'maximum'
• Why build on a green belt site? Guildford (Slyfield) still have empty sites available.
• Can you imagine how the increasing commercial traffic in the vicinity will gridlock many local roads and in particular the
  A247
• 'The 2017 Employment Land Need Assessment' shows a reduction in demand of 3.9 hectares for industrial land for the
  whole borough of Guildford. Why should there be a need to increase the allocation of 10 hectares in Send, an area situated
  within the Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/273  Respondent: 10726497 / David Ian Ness  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Green Belt Policy 2 (paragraphs 3, 4 & 15)

Send Business Park should remain in the Green Belt. It adjoins farming land currently being used to grow crops.

As I have previously stated in this letter, Tannery Lane is not suitable for any further development and should remain in the Green Belt unless there are other motives that we are not aware of!!

The land behind the business park is a 'flood plain' flood relief for the River Wey, and created by nature itself! It is a safe haven for many types of wild life

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have further objections to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill Policy A25 and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick's Arch Policy A43, Policy A44 1.9ha. Policy 42. I object with the following points on these policies:

1. The building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. Garlick's Arch has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

2. The development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

3. The proposed industrial development of 7,000 sq m Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

4. To building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the new marina will generate heavy traffic too. The lane and the main A247 road cannot take any more.

5. To the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

6. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/954  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43A. I object to this policy on the following point:

1. The proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1958  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no clear consideration to the infrastructure requirements. The current infrastructure is already at breaking point and becoming inadequate. Further proposed housing levels, roads, doctors and schools will be unable to cope. No adequate consideration has been given for the proposed growth of housing and residents. The A3 and surrounding roads including the A247 are all already at 100% capacity and grid locked at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1959  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2. The removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1960  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1961  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send because all the development that is required can be accommodated in Guildford's urban brownfield areas and is much closer to existing transport hubs.

The whole destruction of the Green Belt in this area is in clear contravention of the central government's stated commitment for Green Belt Protection.

I would hope that all my objection points listed above will be taken into consideration.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/382  Respondent: 10726561 / L. Boyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have not followed correct process. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which I believe GBC are trying to do. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1619  Respondent: 10726977 / C.M. Lavender  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council's Local Plan

I am writing to object to the "final draft" of the Local Plan which has been prepared without the requisite full consultation under Regulation 18 to the residents of Send village. The Local Plan has changed vastly from that originally proposed, and objected to, in 2014, raising the number of proposed houses from 430 to 485, and now adding a new road junction which was not mentioned in the earlier Plan.

Guildford Borough Council has not provided sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA). A significant number of the new homes needed could be built on brownfield sites, not green belt sites, as proposed.

I strongly object to Send being removed from the green belt. The fundamental aim of green belt policy was to prevent urban sprawl by keeping land permanently open. Local authorities were encouraged to consider protecting land around their towns and cities by the formal designation of clearly defined green belts. While the need for new housing is
appreciated, there is absolutely no reason these should be built on green belt land when there are so many brownfield sites available.

I object to the proposal for 400 houses and 7000 sq m of industrial and warehousing at Garlick's Arch, and a new interchange onto the A3 at Burnt Common to serve this development. Again this has not been consulted upon previously and was not included in the Regulation 18 draft. The amount of traffic coming through Send to access this proposed new junction would cause gridlock in an area where many of the roads are already extremely busy.

I also object to the proposed new homes on the land west of Winds Ridge and Send Hill. Yet again, this was not included in the regulation 18 draft and has not been consulted upon previously.

One of the main reasons for the objection to this area is that the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

Finally, the infrastructure in the village of Send just does not exist to support any of this proposed extreme development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/215  Respondent: 10727009 / A. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

However, I have no objection to the development of 45 houses at Clockbarn Nursery, Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/400  Respondent: 10727009 / A. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
However, I have no objection to the development of 45 houses at Clockbarn Nursery, Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the proposed development of Land at Garlick’s Arch, Burnt Common. Policy A43

I object to the encroachment on ancient woodland. Policy A43

I object to the proposed 7000 sq. m. industrial development at Garlick’s Arch, Burnt Common. Policy A43

I object to the development of the proposed new 4-way interchange from the A3 at Burnt Common. Policy A43

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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In the publication 'About Guildford' it is stated that 'less than 700 homes per year will be built in total'. Why are most of these homes being built in the Send Area? There are brown field sites which could be developed elsewhere, rather than in our beautiful Green Belt area around Send.

Why has Garlick's Arch suddenly been included at the last minute in the Development Plan? This doesn't match with the statement 'Only 1.6% of greenfield land will be taken and allocated for development' (again in the publication 'About Guildford'). No time has been given for adequate consultation here and it has not been included in previous consultations.

Is all the greenfield land coming from the Send and Ripley area?

The NPPF prevents the merging of settlements without any exceptions. Why has this been proposed?
I object to the proposed development of Land at Garlick's Arch, Burnt Common. Policy A43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/401  Respondent: 10727009 / A. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the encroachment on ancient woodland. Policy A43

Industrial and Warehouse Development

Why has industrial and warehouse space of 7000 sq. m. been proposed? There is room at Slyfield which should be fully developed to prevent proliferation of industrial areas in the Surrey Countryside. Keep them all on one site. Traffic would be intolerable for the residents in the Send area. The nature of the village of Send would be irrevocably changed by so much traffic.

I object to the proposed 7000 sq. m. industrial development at Garlick's Arch, Burnt Common. Policy A43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/402  Respondent: 10727009 / A. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I note a 4-way interchange is proposed onto the A3 at Burnt Common to serve the Garlick's Arch development. Traffic is already bad on the A247 and it is gridlocked every morning. It would become intolerable if this development took place. It is already gridlocked in the morning and traffic would be at a standstill in the area. Send Barns Lane would become a through route for Woking.

I object to the development of the proposed new 4-way interchange from the A3 at Burnt Common. Policy A43

---
I object to the development of Land West of Winds Ridge and Send Hill, Policy A44

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I also note that there are other new inclusions under Policy A44 for the inclusion of 40 homes and 2 travellers' pitches. This is absolute madness to build on landfill. Breathing pipes are in place to vent the landfill. People who live there would suffer ill health. The lanes around there are far too small to cope with travellers and their caravans. It is a country lane and unfit for development.

In addition procedural regulations have now been followed. This should have been put out for fuller consultation under Regulation 18.

I object to the development of Land West of Winds Ridge and Send Hill, Policy A44 for 40 new homes and two Travellers' Pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to any erosion of Send’s Green Belt status under Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In the publication 'About Guildford' sent out by Guildford Borough, there is the statement 'Over 89% of our borough is within the green belt'. Why are GBC proposing to remove Send altogether from the Green Belt? Why aren't GBC fighting to keep Send in the Green Belt?

Why has Send been disproportionately hit by development? Is it because the majority of the Councillors/Officials involved live in a different area, rather than in the Send Area? Is there corruption involved with links with building companies?

The village of Send must be preserved in its village identity to prevent there being an urban sprawl between Guildford and Woking.

I object to any erosion of Send's Green Belt status under Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please ensure my objections are made known to the Planning Inspector.

I object to the inclusion of major changes to the developments in Send which should receive full consultation instead of six weeks under Regulation 18.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4142  **Respondent:** 10727201 / Graham Rutherford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan for the following reasons;

We live in Burpham. The proposed developments at Gosden Hill and Wisley will obviously increase the volume of traffic in the area. We live in Orchard Road which exits onto the old London Road near the BP garage. At busy times it is already difficult to leave our road because of the volume of tightly packed traffic in what is effectively the slip road off the southbound A3 not only for traffic coming into Guildford itself but also going through Jacobs Well to access, inter alia, the southern side of Woking.

It may be expected that one day there will be a tunnel bypass under Guildford and the northern entrance is likely to be on Martin Grant land.

Therefore the suggested development on Gosden Hill should be halved in the number of homes.

Guildford desperately needs new homes for the benefit of the current workers and population, our children and grandchildren but much more thought needs to be given to seriously expanding the current infrastructure of roads, water supply, sewage and utilities. Upfront integrated thinking is needed and funding made available.

We should not argue about the forecast needs of homes. The problem is to get started and see how the needs develop especially since the Brexit decision may reduce demand long term.

Another urgent need is to expand the south bound exit from Guildford onto the A3. At busy times this is log jammed because three lanes are squeezed into two.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/2837  **Respondent:** 10727457 / Colin Eke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I object to the 2016 Draft Local Plan for the following reasons;

We live in Burpham. The proposed developments at Gosden Hill and Wisley will obviously increase the volume of traffic in the area. We live in Orchard Road which exits onto the old London Road near the BP garage. At busy times it is already difficult to leave our road because of the volume of tightly packed traffic in what is effectively the slip road off the southbound A3 not only for traffic coming into Guildford itself but also going through Jacobs Well to access, inter alia, the southern side of Woking.

It may be expected that one day there will be a tunnel bypass under Guildford and the northern entrance is likely to be on Martin Grant land.

Therefore the suggested development on Gosden Hill should be halved in the number of homes.

Guildford desperately needs new homes for the benefit of the current workers and population, our children and grandchildren but much more thought needs to be given to seriously expanding the current infrastructure of roads, water supply, sewage and utilities. Upfront integrated thinking is needed and funding made available.

We should not argue about the forecast needs of homes. The problem is to get started and see how the needs develop especially since the Brexit decision may reduce demand long term.

Another urgent need is to expand the south bound exit from Guildford onto the A3. At busy times this is log jammed because three lanes are squeezed into two.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5864    Respondent: 10727457 / Colin Eke    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5866    Respondent: 10727457 / Colin Eke    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the proposed development Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/5863  Respondent: 10727457 / Colin Eke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to Policy A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11884  Respondent: 10727457 / Colin Eke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the impact on the infrastructure around the villages. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11883  Respondent: 10727457 / Colin Eke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the impact on the greenbelt status of the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2573</th>
<th>Respondent: 10727489 / Gaynor Eke</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objection to 2016 Local Plan**

I OBJECT to the Guildford draft plan and its impact on the villages of Send and Ripley in particular plans A25, A35, A42, A43, A43a and A44
• I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5293  Respondent: 10727489 / Gaynor Eke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5294  Respondent: 10727489 / Gaynor Eke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT to the proposed development Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5292  Respondent: 10727489 / Gaynor Eke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a (Land for North facing slip roads to/from A3 at Send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5295   Respondent: 10727489 / Gaynor Eke   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I PARTICULARLY OBJECT to the proposal in Policy A44 of the local plan Land West of Winds Ridge and Send Hill on the grounds that:

- The site is not large enough for the proposed use.
- The siting of two travellers pitches in Send Hill will be detrimental to both Send Hill and the Send/Ripley areas with house values and people’s desire to move into the area adversely affected.
- Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
- Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status and would be spoilt by development.
- The existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
- Too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
- The proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
- This would cause loss of village identity, be detrimental to the community and increased flood risk.
- A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to properties.
- GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.
- Both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard.
- The Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 - Identifies proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the...
proposed usage. It also Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes concern as to what it does contain and dangers if disturbed.

Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a planning inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10690  
Respondent: 10727489 / Gaynor Eke  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT to the impact on the infrastructure around the villages. The roads around Send and Ripley are already congested and cannot cop with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10686  
Respondent: 10727489 / Gaynor Eke  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10687  
Respondent: 10727489 / Gaynor Eke  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to the impact on the greenbelt status of the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1609  Respondent: 10727553 / D. Wakeling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live on send hill and I object to all the plans concerning Send especially on Send Hill, the road that passes the cemetery. It is narrow and dangerous at this moment, any development in this area is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2985  Respondent: 10728065 / Rona Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Policy A44 the land west of Send Hill.

I object to the Green Belt area in Send being reduced in size or removed altogether. All Green Belt was supposed to be unchangeable by law. When it was set up originally, it was to control urban growth providing at the same time a 'lung' around London for the benefit of the people living in the capital. How can the air quality in London be improved if the Green Belt is gradually eroded with bricks and concrete?
I object to the number of houses being proposed ie 40. The site is not large enough. *If you take the footprints of the 21 houses shown on one side of Send Hill only and put them on the area owned by the GBC they will not fit, and that is not even allowing for garden space!*

*Also there is the question of the suitability of the land owned by the GBC to be used for housing as the land was infilled some years ago and vented to measure the methane gas that was released and is still being monitored.*

I object to the inclusion of two Traveller pitches included on the site as being totally unsuitable both to Travellers and householders sharing the site. It is wishful thinking to believe that both parties would want to be integrated. Have the Travellers asked for this?

I object to all the extra road traffic that such a project could bring to the village. Every household could have at least two cars and the congestion that that would cause on Send Hill and to the main Send Road, which is the only road to Woking, will bring chaos to an already overstretched system.

I object to the possible loss of a beauty spot which is only accessible at present by footpaths and which is enjoyed by people in the village and visitors.

I object to adding to the increase in the number of residents in the village (as there are other housing proposals throughout the village) because of the pressure on the already stretched medical and educational facilities in the village.

*On the other hand a small development, without Travellers pitches, and in keeping with the surrounding properties, on the privately owned land that was never infilled could be a possibility.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the 400 houses proposed at Garlick's Arch and Industrial site. This seems an excessive number of houses (plus the others already mentioned). The doctors' surgery is working to full capacity and appointments are a problem already. The new school being built will take the pupils from the present two schools but cannot possibly cope with the great number of children expected from so many new homes. This site is also new and was not included in the Regulation 18 draft and has NOT been consulted upon previously. The site is Green Belt permanently protected by the NPPF. Ancient trees c1600 AD would be endangered. Large industrial space can be provided at Slyfield.

In conclusion, some new affordable homes would be welcomed in Send but the huge numbers proposed would overwhelm the already stretched infrastructure available, whether surgery, schools or narrow roads which would become completely gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3988  Respondent: 10728321 / Michael Randles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the proposed massive new road junction which would increase large traffic in the already congested Send Road and surrounding minor roads. I have seen large lorries with their wheels on part of the narrow footpath in Send Road due to the lack of room to accommodate their size on one side of the road. All the access roads to this site are narrow. There is already access to the A3 road in the London direction provided at Burpham, and traffic from the Woking area can access this by the Woking Road which is wide enough to take large vehicles. Send Road only leads into the tiny mini-roundabout at Old Woking High Street – a junction of even smaller roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3989  Respondent: 10728321 / Michael Randles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO land west of Winds Ridge and Send Hill being removed from the Green Belt to provide 40 homes and 2 travellers pitches. This is a new site and not included in the regulation 18 draft and has NOT been consulted upon previously. Part of the site is contaminated. I remember, some years ago asking a long term resident of Send (a highly respected partner in a local building company) if he knew why the mature trees along by the footpath were dying and he replied that highly toxic material had been dumped in what had been a landfill site. This had not been removed but merely covered by earth which should never be disturbed as it would be a danger to anyone involved. As far as I can tell vents were not placed near where these trees died. The upper part of the site has become a wildlife haven where deer have their young, badgers and foxes have been seen 'and many birds find protection.

I OBJECT ALSO TO the provision of travellers' sites to the rear of houses in Send Hill where there have been none before. The sites appear to include the footpath used by me and other local people as a short-cut into Send Village. Surely the narrow single-track country road could not provide sufficient access to this site for often rather large caravans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO the proposal to remove Send from the Green Belt. The Conservative manifesto promised to protect the Green Belt if elected! This village provides a green lung between Guildford and Woking. It is a pleasant area and unrestricted development would change it forever. Residents have chosen to live here because of the rural aspect and this would be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object:

1. The land is green belt area and should not be used as residential
2. Tannery Lane is extremely narrow, winding and dangerous and is not at all suitable for increased traffic

Such a large percentage increase in the population of Send village is entirely inappropriate for such a small rural community with already difficult traffic issues, as well as being destructive to quiet recreational countryside areas and wildlife habitats.

Thank you for taking into account my objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Thank you for taking into account my objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object:

1. The land is in green belt area and has not been previously built on.
2. The area is on the quiet outskirts of the village and development would spoil the rural nature of the area.
3. Send Hill access is a narrow road (very narrow and dangerous at one end) and is not suitable for the increased traffic.
4. The area was previously used for landfill, with an incompletely known history. One gas monitoring well at the site has recorded methane discharge.
5. The area is rich in wildlife including some rare and/or protected species such as badger and bee orchids.
6. The area is used extensively by locals for recreation such as dog walking.
7. The Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies "potential risk from landfill gas migrations" which would be a health risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/7468</th>
<th>Respondent: 10728481 / Patricia Ray</th>
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<tr>
<td>3. I OBJECT to the proposed interchange with the A3 at Garlic's Arch</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to all erosion of the Green Belt.</td>
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<td>2. I object to any insetting of any villages from the Green Belt.</td>
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<tr>
<td>1. I OBJECT to any likely destruction of woodland inside and outside the Green Belt.</td>
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<tr>
<td>REASON: Much of the Green Belt and outlying area consists of woodland. The roots of mature trees reach deep into the soil which produces a function similar to a sponge; this collects rain water, REDUCES RUN OFF, and will LESSEN RISK OF FLOODING. The upper branches and leaves of trees provide a filter from airborne pollution emitted in exhaust fumes from vehicles.</td>
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Comment ID: PSLPP16/7463  Respondent: 10728481 / Patricia Ray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the limited consultation period given.

1. I OBJECT to the last minute inclusion of new sites with insufficient notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5421  Respondent: 10728897 / M.L. Campbell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I personally object to Send village being removed from the Green Belt.

When the Green Belt was set up it was to be permanent, not to be changed in any way, therefore the word is and remained PERMANENT until recently.

Please think again, because if you change the Green Belt status and the lovely community of Send, it will be gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2917  Respondent: 10728993 / Gill Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<tr>
<td>I OBJECT to new sites like Garlick's Arch being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A 3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.</td>
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<tr>
<td>I OBJECT to a totally unrealistic number of houses for the country lanes to absorb.</td>
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<td>I OBJECT to the removal of villages from the Green Belt.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to raising the annual number of houses built per year. With no rational reason given, one must assume these are
developers' numbers for financial gain and not for social need.

I OBJECT to the disproportionate distribution of houses across Guildford Borough, by far the North East has taken an
unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes
roads gridlocked at rush hour.

I OBJECT to the methodology of drawing-up the plan. Guildford Borough employs consultants who allegedly have
planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs
involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely,
logic would suggest planning is best formed by a bottom up approach, not top down.

I OBJECT to the 2016 Draft Local Plan as it has had no regard to the number of schools required or additional health
centre or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3045  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Gosden Hill Farm, on the basis that the proposal is too large, occupies Green Belt
land and will add to infrastructure problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3031  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Gatlicks Arch (policy e 3). This site was included very late into the proposals, and I believe that the commercial needs-if true-could be catered for elsewhere (such as near Slyfield). The proposed amount of residential dwellings is excessive, and the site is clearly within the current Green Belt.

I object to the proposal for a new 4-way entry/exit slip-road (for A3 access) at Burnt Common (policy A43a). This would place enormous pressure on local roads and highways, and Send resident's have already suffered a great deal in recent times with traffic congestion. Many residents fear that Send Road will become bogged down with additional traffic as a result of the various proposals (Wisley airfield, Garlick' s Arch, Merrow and Burpham).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3036  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Winds Ridge I Send Hill (policy A44). This site is also a late inclusion. and there has not been sufficient consultation. Access is too narrow, and the land appears to subject to potential contamination (from past usage as landfill). The site also sits within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6577  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1326 of 3142
I object to the likely impact on the overall road infrastructure of Send village. We are surrounded by lanes, not roads take for example Polesden Lane (where there is only room for one-way traffic in many sections), Newark Lane (with a very narrow mouth and room for one-way movement), Papercourt Lane, Send Barns Lane, Tannery Lane and Potters Lane. At Send Hill, Vicarage Road and Woodhill, the lanes are only wide enough in parts for one-way movement.

I object to the likely impact on services -such as schools and the GP surgery, It is already very difficult to get a prompt appointment with the medical surgery, and adding more homes will make this even harder. There are no contingency plans for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6531  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all changes being made to the definitio nand boundaries of the existing Green Belt areas. I understood that such areas are in place with the intention of providing permanent protection, as set out by Councillors and central Government. Green Belt areas prevent excessive 'urban sprawl", provide a natural balance between towns and countryside, and contain much valued wildlife.

I object specifically to the proposals to move Send from the Green Belt. I believe that this is senseless, as Send- like Ripley-is a village. Even the local GP surgery is named 'The Villages'. Proposals to redefine it as a small town, and to re-draw the Green Belt boundaries via 'insetting', should be dismissed. I understood that 'special circumstances' were required before any Green Bell could be re-designated -none appear to exist here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6560  Respondent: 10729281 / Richard Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the manner in which the latest proposals are significantly different from the previous local plan in 2014. Calculations and assessments (for housing needs) have been re-evaluated and I believe that they are not accurate or truly reflective of the needs of the local area. Recent proposals for local housing have been assessed at wildly differing levels in the last two years, and so one has to question the methodology used.

I object to the lack of consideration given to 'brownfield' sites. It seems clear that there are sufficient 'brownfield' sites available and therefore there is no need to access or use any Green Belt land. I believe that the overall intention of the proposals is to 'inset' the villages from the Green Belt, paving the way for future re-development that simply is not needed at the levels suggested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to removing the Send Lakes from being a (Site of Nature Conservation Interest) SNCI status. Bats, Herons, Kingfishers and Hedgehogs are all part of the wildlife that can be seen in and around the Lakes. The local plan should encourage this through policies aimed at preserving the lakes SNCI status as a part of the local plan's environmental sustainability. It should not be removing them from SNCI status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A42 change at Clockbarn Nursery Tannery Lane to building 60 houses. There are issues with groundwater flooding and it will make the junction with Tannery Lane and the main Send Road hazardous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A58 Land at Burnt Common allocation for a minimum of 7,000 square meters of industrial warehousing. The allocation for a minimum of 7,000 square meters of industrial warehousing is major expansion and overdevelopment. It will increase traffic and pollution on the A247.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Green Belt Policy P2 at paragraph 4.3.15 to inset Send Business park from the Green Belt. Tannery Lane and Papercourt Lane are narrow and two vehicles cannot pass. It is unsuitable site for expansion on the scale proposed in the draft 2017 Local Plan.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>
I object that GBC has failed to provide sound evidence in terms of ELNA 2015 which shows an 80% reduction in employment space from the previous ELNA carried out in 2013.

I object therefore to the use of Burnt Common as ‘industrial space’ as this is no longer required.

I object to the questionable nature of the housing numbers from the Strategic Housing Market Assessment.

I object to the wrong use of foreign student numbers to inflate the need for housing.

I object to what appears to be an exaggeration in the number of houses needed in the local plan (ie 13,860).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object that GBC have (dishonestly?) ignored the latest ELNA 2015 showing the reduction of 80% in required employment space from the previous draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ( )

THE FINAL DRAFT LOCAL PLAN (SEND) OBJECTIONS

Please make sure that my views are made known to the Planning Inspector. I commence with a general point.

I object very strongly to the underhand, dishonourable and unacceptable behaviour towards the people of Send. Your behaviour is truly worthy of condemnation as completely unbefitting of a public institution. I object to this blatant display
of utter contempt for the people of Send. You should be ashamed of yourselves. You are a disgrace to Guildford and have run roughshod over the reputation of Guildford Borough Council.

I continue with detailed objections.

I object to the removal of Send Village from the Green Belt altogether.

I object to what appears to be the strong reluctance of GBC to build on brownfield sites (50% of new homes needed could be built on brownfield sites).

I object to the failure of GBC to follow the correct process. Since 2014 GBC has changed every major site in Send proposed for development and has now just added a massive new road junction. These significant changes require another full consultation under Regulation 18.

I object to GBC trying to use Regulation 19 and, therefore, the invalidation of this whole process.

I object that GBC has failed to provide sound evidence in terms of ELNA 2015 which shows an 80% reduction in employment space from the previous ELNA carried out in 2013.

I object therefore to the use of Burnt Common as ‘industrial space’ as this is no longer required.

I object to the questionable nature of the housing numbers from the Strategic Housing Market Assessment

I object to the wrong use of foreign student numbers to inflate the need for housing.

I object to what appears to be an exaggeration in the number of houses needed in the local plan (ie 13,860).

I object to the lack of attention being given by GBC to infrastructure overload.

I object to what appears to be the gridlocking of Send. Send will be choked by large lorries, many more cars, and therefore dangerous levels of pollution, on top of the close proximity of the A3 and M25. This appears to be a deliberate policy of GBC.

I object to the dangerously high levels of pollution which will be the result of the plan.

I object to the removal of the Green Belt buffer that Send provides between Guildford and Woking. It will become one suburban sprawl.

I object to policy A43 involving Garlick's Arch (38ha), Burnt Common (400 houses and 7000 sq. m. of industrial and warehousing). This site is new and was not included in Regulation 18! It is Green Belt under NPPF protection.

I object that GBC have (dishonestly?) ignored the latest ELNA 2015 showing the reduction of 80% in required employment space from the previous draft plan.

I further object in the above context to the planned 4-way interchange onto the A3 at Burnt Common. Send would be obliterated by the sheer, unsustainable weight of traffic. Who are these people and what sort of people are they who can propose such horror for the entire population of Send?

I object that GBC have shown little sign of common decency and humanity towards us, the citizens of Send who pay rates to GBC which should be remembered!

I object to Policy A44 (1.9ha). The site 'land west of Winds Ridge and Send Hill' - 40 homes and two travellers' pitches is a new site and was not included in the Reg. 18 draft and not consulted upon. This site has permanent green belt status and is part of an area of lovely countryside which ought not to be spoilt. The subsoil contains documented unsafe landfill waste which is vented. A single track road provides inadequate access.
In 'A Local Plan for Local People' (GBC's publication about Guildford - Summer 2016), GBC states 'Our revised plan is designed to protect and enhance the area whilst improving the borough for generations to come. Whether travelling by train, bus, car, bike or foot, the revised local plan aims to deliver a joined up local strategy. I object that as applied to Send, Ripley and other parts of Guildford, this publication by GBC is glib and lying nonsense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/218  Respondent: 10729473 / P.T. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object that GBC have shown little sign of common decency and humanity towards us, the citizens of Send who pay rates to GBC which should be remembered!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/219  Respondent: 10729473 / P.T. Elms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to what appears to be the gridlocking of Send. Send will be choked by large lorries, many more cars, and therefore dangerous levels of pollution, on top of the close proximity of the A3 and M25. This appears to be a deliberate policy of GBC.

I further object in the above context to the planned 4-way interchange onto the A3 at Burnt Common. Send would be obliterated by the sheer, unsustainable weight of traffic. Who are these people and what sort of people are they who can propose such horror for the entire population of Send?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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**Comment ID:** SQLP16/204  **Respondent:** 10729473 / P.T. Elms  **Agent:**

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I object to the failure of GBC to follow the correct process. Since 2014 GBC has changed every major site in Send proposed for development and has now just added a massive new road junction. These significant changes require another full consultation under Regulation 18.

I object to GBC trying to use Regulation 19 and, therefore, the invalidation of this whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2451  **Respondent:** 10729537 / Julia Osborn  **Agent:**

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I object to removing the Send Lakes from being a (Site of Nature Conservation Interest) SNCI status. Bats, Herons, Kingfishers and Hedgehogs are all part of the wildlife that can been seen in and around the lakes. The local plan should encourage this through policies aimed at preserving the lakes SNCI status as a part of the local plan’s environmental sustainability. It should not be removing them from SNCI S.L.1.Js. The lakes act as an important “green lung” and wildlife corridor for the village.

I object to site A42 Clockbarn Nursery, Tannery Lane. In recent documentation for planning application 14/P/02289 - Land to the north of Tannery Lane and east of Wharf Lane Send, surface water was considered an issue (see item 4.3 Noo technical Drainage report by Stilwell Partnership. In response a drainage strategy was submitted by Johns Associates proposing - Surface water run off is to be managed by digging deeper ditches around boundaries of the site, infiltration and attenuation ponds. This land adjoining site A42 Clockbarn Nursery. The building of houses on Clockbarn has potential to add pressure to land drainage and increasing the risk of surface water flooding. This scenario is not covered in GBC’s Surface Water Management Plan (SWMP) as this plan preceded approval of application 14/P/02289. The SWMP is a necessary part of the evidence base to ensure that Local Plans manage flood risk as required by the NPPF - but with regard to site A42 this is not covered by SWMP and this site is not compliant with NPPF requirements to manage flood risk from all sources.

Moreover, in the case officer report for approved application 14/P/02289 - Land to the north of Tannery Lane and east of Wharf Lane Send it is noted that the nursery to the west of this site (I.e.
Clockbam Nursery, site A42) provides foraging habitat for bats. This would appear as a mitigation measure for approval of application 14/P/02289 and it would not now be appropriate to destroy this wildlife corridor to the west of the Marina development by building houses on the site.

I object to site A43a Burnt Common on and off slip roads to the A3. The traffic impact on the A247 through Send and Clandon and surrounding B roads would be immense. Air quality monitoring has not been undertaken on the A247 ahead of this proposal. This new road junction is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly.

I object to site A43 Land at Garlick's Arch, Send Marsh, Burnt Common and Ripley and building 400 houses on this site as this site was not included in the initial consultation of the Draft Local Plan in 2014. This number of houses is out of scale and all proportion for a village settlement. Moreover, this area of land is identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume N (2014). See page 62. This site is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly.

I object to site A44 Send Hill. This site is a significant change between the Regulation 18 and Regulation 19 consultation and people have not had opportunity to be involved or consulted accordingly. Moreover, this area of land is identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume N (2014). See page 59.

I object to Gosden Hill site A25 (building 2000 houses) and I object to land at former Wisley Airfield site AJS (building 2000 houses) Both these developments are at odds with the sustainability corridor and the impact on junction 10 of the M25 would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/915  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LOCAL PLAN 2016 (strategy and sites document).

I am writing as resident but I am also a Send Parish Councillor. I am concerned that this plan is not sustainable, it is not environmentally sustainable, that the evidence base is unsound and that this Local Plan is not compliant with the National Planning Policy Framework (NPPF) guidelines. I have structured my comments on the proposed submission Local Plan 2016 strategy and sites document into three sections: Section 1, comments on the evidence base, soundness of the plan and legal compliance. Section 2, comments on policies. Section 3, comments on sites.

SECTION 1: Comments on the evidence base, soundness of the plan and legal compliance.

I do not agree that the Local Plan is sound, that the evidence base is up to date 01 that the plan is legal compliant for the following reasons:
1). GL Hearn’s Strategic Housing Market Assessment (SHMA) proposes building 693 Dwellings Per Annum (DPA). However representations made by Tibbalds Planning and Urban Design consultants on behalf of Send Parish Council illustrate that this number accounts for a buffer of more than 20%. In reality this means allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA. The housing figures in the SHMA are therefore inaccurate and unreliable.

2). Guildford Borough Green Belt and Countryside Study is tailored around the Settlement Hierarchy Report and the Strategic Housing Market Assessment Report (SHMA). The Settlement Hierarchy is based on a subjective spatial strategy of large/medium and small villages. With regard to the SHMA, have detailed my concerns as in point 1 above.

3). Guildford Borough Green Belt and Countryside Study is used to rule out sites in GBC Flood Risk Sequential and Exception Test (May 2016) but these sites would otherwise meet the GBC Flood Risk Sequential and Exception Test (May 2016). See Appendix I stages 1,2 and 3.

4). Guildford Borough Council’s Surface Water Management Plan (SWMP) was produced prior to the approval of planning application 14P02289:Land to the north of Tannery Lane and east of Wharf Lane. This planning application required a drainage strategy to mitigate surface water. This development borders site A42 Clockbam Nursery. As the SWMP preceded approval of this planning application the SWMP is now outdated as an evidence base document to manage flood risk as required by the NPPF with regard to A42 Clockbam Nursery.

5) Each and every site in Send Parish has been added since the Regulation 18 consultation, including a major development of 400 homes at Garlick’s Arch and on/off slip roads on to the A3.

6) The introduction of Garlick's Arch and on/off slips roads on to the A3 have been added so late within a Regulation 19 document that statutory consultees such as Highways England have not had a chance to comment.

7) The Transport Assessment was provided during the consultation period and was not available to inform Councillors at the full Council meeting on the 24th May 2016.

8) Councillors have not been able to scrutinize all documentation, including the OAN figure for the SHMA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/916  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy Sl. Sustainability should include the Green Belt as an absolute constraint I object to Policy S2.

I object to the proposed housing figure for the Local Plan to build 13,652 homes at 693 DPA for next 20 years (2013-2033). The housing figure for this plan is unsustainable and the plan does not apply constraints. Local infrastructure will not cope. Paragraph 4.1.12 of the proposed submission Local Plan acknowledges that the number of houses is greater than required.

Representations made on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants illustrate how allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA.
According to NPPF guidance Paragraph 47 stipulates that planning authorities should provide for an additional buffer of between 5-20% and based on this advise the figure would be in region of 727-832 DPA. The provision in the GBC Local Plan to build 910 DPA is therefore excessive.

Without applying constraints the housing figure could rise even higher than 13,652 houses when windfall sites are taken into consideration.

I object to building 485 homes in Send Parish. The scale of development for Send lacks all sense of proportionality. For example Thame in South Oxfordshire has population of approximately 11,000 and a site for 800 was proposed by the Council. Send has a population of approximately 4000 and GBC has allocated 485 houses be built. The population increase will lead to congestion on roads, pressure on local schools, the Villages medical centre and hospital facilities.

I strongly object to Policy HI Homes for all.

During the 2014 consultation I referenced a report by John Peny (2012) "UK migrants and the private rented sector" for the Joseph Rowntree Foundation. The report noted that taking account of ONS 2011 census data, 75% of migrants who came to the UK in the past five years reside in the private rented sector.

Demographics of the private rented sector (including Houses of Multiple Occupation -HMOs) are an important factor when producing a strategic plan to provide appropriate housing rather than continued reliance on the private rented sector. The plan contains no mechanism to address this or reducing reliance on the private rented sector. Instead GBC has recommended "monitoring" the number of houses of multiple occupation through the number of planning applications.

However monitoring will be ineffective when planning permission is not required to change from a C3 (small dwelling house) lo C4 (small house of multiple occupation of up to five unrelated individuals). GBC cannot therefore be able to determine the true extend of HMOs and the private rented sector.

However the numbers of those living in the private rented sector inflate the overall housing figure upwards while this plan fails to address the necessary tenure mix of new built dwellings required for this section of population "need"as opposed to building housing on volume. Infact the plan recommends continued use of the private rented sector as a tenure mix and affordability solution. If this recommendation is in addition to the total number of new houses proposed by the plan, then the net effect is to significantly increase population in Guildford,not to address affordability or pressure on existing housing stock that the private rented sector contributes too. Failure to tackle the private rented sector will in turn further inflate housing market prices and leads to more issues of affordability in the longer term.Research published by the Bow Group titled "Solving the UK Housing Crisis"(November 2015) by Daniel Rosall Valentine, underlines these issues further. It is demand rather than need that is fuelling OAN figures upwards and this plan fails significantly to address this.

I strongly object to Policy HI Affordable Homes or that this Local Plan addresses building affordable housing for local need. Current guidance on producing SHMA,s Jacks a meaningful needs-based definition of affordability - such as for example the proportion of income allocated to housing costs. OAN figures alone therefore cannot tackJe affordability or need (defined as a basic human need to have a roof over our head). I believe that a more meaningful approach to addressing local need is through Neighbourhood Plans and local land trusts. They provide a mechanism to meet local need while preserving and enhancing villages characters. We need local planning that works with local communities. The bottom up approach of Neighbourhood Plans rather than the top down approach of SHMA with an OAN figure incompatible with genuine affordability is a more realistic approach to addressing local need.

Moreover, a recent Rural Housing Needs Survey commissioned by Send Parish Council in 2013 found that "local need"was relatively low with in Send Parish.

I object to Policy P2 Green Belt

I object to removing/ insetting villages from the Green Belt for the following reasons:
1) NPPF guidance makes clear that Green Belt boundaries should only be altered in exceptional circumstances through the Local Plan process. Unmet housing need is unlikely to outweigh harm to the Green Belt and constitute ‘exceptional circumstances’.

1. Send Village should remain in the Green Belt. The village of Send with its proximity on the border of Woking is a village which fulfils paragraph 65 of the NPPF which stipulates that Green Belt is to check unrestricted sprawl of large built-up areas and to prevent neighbouring towns from merging. Paragraphs 79-86 of the NPPF should therefore be applied to Send as a constraint and Send should not be removed from the Green Belt.

   • Moreover the basis for Policy P2 is the Guildford Borough Green Belt and Countryside Study.

3a) Guildford Borough Green Belt and Countryside Study has lacked consistency to Green Belt boundaries. Land in Send Parish which was initially identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014) has now been allocated for housing development as sites A43 and A44.

3b) Elsewhere, Guildford Borough Green Belt and Countryside Study is used to rule out other sites which meet the GBC Flood Risk Sequential and Exception Test (May 2016), See Appendix 1 Stag 1, 2 and 3 page 25. Again there is a lack of consistency in approach.

   • The Settlement Hierarchy is another key evidenced based document for Policy P2 which is IL makes a subjective decision that Send Marsh and Burnt Common are categorised as a large village due to their proximity to Send services. In practise this is a small convenience store attached to a garage/fuel station. Had this not been so Send Marsh and Burnt Common would have been classified a medium village. Medium villages are unsuitable for substantial growth (such as site A43 Garlick’s Arch). Please refer further to ‘Representations on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants).

I also object to Policy D4 Development in Urban Areas and Inset Villages for all the reasons above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/563  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1) I am objecting to ALL proposals for Send in the LOCAL PLAN 2017 Regulation 19 (as set out above) on the grounds that these proposals accumulate to development that is not sustainable for Send.

1.2) I am objecting because the overall scale of development proposed for Send in in Guildford Borough Council (GBC) draft Local Plan 2017 is not support by the evidence base for the plan. For instance, a key document used to assess sustainability is the Settlement Hierarchy’s (2014). However, the Settlement Hierarchy document has not been updated since the beginning of the Local Plan process in 2014 and as a result the proposals set out in the 2017 draft and which outline major development of Send are not substantiate by evidence that Send is a village capable of accommodating...
“major development” in accordance with the Settlement Hierarchy 2014. I will expand this point further in my objection to Policy A58.

Moreover, as the Settlement Hierarchy’s 2014 document is a key piece of the evidence base underpinning Policy P2 Green Belt of the Local Plan; it would appear that as a result of the 2017 changes for Send in the draft Local Plan (which are not supported by the Settlement Hierarchy’s 2014) Policy P2 is at odds with NPPF guidance on the role and purpose of the Green Belt to act as an important constraint on development to ensure sustainability of settlements.

Send is a rural village in the Green Belt. The changes introduced in the Guildford Borough Council (GBC) draft Local Plan 2017 to include two strategic employment sites (A58 and change to Policy 2, paragraph 4.3.15 removal of Send Business Park from the Green Belt) alone would amount to “major development areas” and this is without even beginning to take into account the 500 houses proposed for this one village.

In Sum, my objections to the Guildford Borough Council (GBC) draft Local Plan 2017, are as follows:-

- The 2017 proposals for Send now amount to vast overdevelopment of Send village.
- The 2017 proposals for Send now make this Local Plan without doubt incapable with its own evidence base (the Settlement Hierarchy and the Green Belt and Countryside Study) for Green Belt Policy 2.
- The 2017 proposals for Send make the Local Plan incapable with NPPF guidance on the Green Belt paragraphs 79 -86.
- The 2017 proposals to expand the Send Business Park make the Local Plan unsound on the basis of NPPF paragraph 100 in relation to flood risk in Tannery Lane.
- The 2017 Proposals for A58 are not supported by Highways England and adequate road infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4002  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to Policy A42 change at Clockbarn Nursery Tannery Lane to building 60 houses.

2.1) I object to the building of an even greater number of houses at site A42 because the draft Local Plan proposals lack a full Level 2, Strategic Flood Risk Assessment (SFRA) of Tannery Lane to consider the cumulative impact of All development proposals for this area of Send (I.e. the development of a Narrowboat Basin, proposed expansion of the Send Business Park and building an increased density of houses at Clockbarn Nursery.)

Paragraph 100 of the NPPF states “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.” And that “Local Plans should be supported by a Strategic Flood Risk Assessment and development policies to manage flood risk from all sources, taking account of advise from the Environment Agency …”

While Tannery Lane is outside of Flood Zone 3, these categories are based on Sea/River Flooding. To fully conform to NPPF guidance all sources of flooding need to be consider in the Strategic Flood Risk Assessment (SFRA), including surface water and ground water flooding.
Evidence presented in relation to the Narrowboat basin application 14/P/02289 John Associates Environmental Statement Vol 8 Water, pages 27-28, reference British Geographical Survey Flood Data by Envirocheck which shows the areas of Send as having ‘high susceptibility’ to Groundwater (which includes Tannery Lane). Further, on page 32 of John Associates Environmental Statement Vol 8 Water, the Environment Agency has Groundwater monitoring borehole W02a, to the west of Prews Landfill site and to the east of the Narrowboat basin site and almost opposite to the house ‘Maybanks’ (which you can see via the map on page 33), as having recordings of shallow groundwater between 0.4 and 1.9 meters below ground. Site A42 Clockbarn Nursery is in the close proximity to the area of Tannery Lane.

2.2) I also object because it is overdevelopment for a small rural B classified road when a Narrowboat basin is already being constructed and expansion of the Business Park is proposed in this 2017 draft Local Plan. A full traffic assessment of Tannery Lane is needed in view of All proposals in this area of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4007  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 policy change to include six travellers plots as the inclusion of traveller pitches is unnecessary according to the level set within the plan, Policy H1, 4.2.24 states that travel accommodation is required in developments of 500 homes or more to provide mixed communities; and Send has already been designated for travellers pitches in the 2016 draft of the Plan.

I also reiterate my objection in 2016 to A43, Land at Garlick’s Arch that this is overdevelopment. The Settlement Hierarchy 2014 classified Send as a large village but representations on behalf of Send Parish Council by Tibbalds Urban Planning and Design (2016) paragraphs 3.1 to 3.4 set out that this classification of Send as a large village only occurred due to the proximity if the Send Services to Burnt Common. As stated in paragraph 3.2 of Tibbalds (2016) submission has this not be the case then Send would have been classified a ‘Medium’ village and medium villages are “unsuitable for substantial growth but are capable of taking appropriate residential infill and development to meet local needs.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4006  Respondent: 10729537 / Julia Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4). I object to Policy A58 Land at Burnt Common allocation for a minimum of 7,000 square meters of industrial warehousing.

4.1) I object because this would be a major development expansion and it would be inconsistent with the Settlement Hierarchy 2014 which identifies Send as a ‘large village’ and according to paragraph 3.4.2 of this document large villages are unsuitable for substantial growth but capable of accommodating an extension. In GBC’s Green Belt and Countryside Study Volume 5 (April 2014) it was concluded that the land at Burnt Common was more suitable as a housing site (in comparison to Garlicks Arch). The original proposals for housing at the land around Burnt Common were therefore more consistent with a large village “accommodating an expansion”. Policy A58 is not consistent with the classification of Send as a large village with GBC’s Settlement Hierarchy 2014 and it would be overdevelopment of a village situated in the Green Belt.

4.2) I object because there is not adequate infrastructure in place to service A58 as a major development site.

4.3) I object because Highways England have not agreed to any plans to develop the A3 between Burnt Common and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2088   Respondent: 10729537 / Julia Osborn   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to Green Belt Policy P2 at paragraph 4.3.15 to inset Send Business Park from the Green Belt.

3.1) I object to Policy P2, paragraph 4.3.15 and designation of the Business Centre as a strategic employment site because this has not been subject to a full review of flooding in accordance with NPPF guidelines. GBC’s Level 2 Strategic Flood Risk Assessment (May 2016) does not include an assessment of this area.

3.2) I object to this policy change as this is an area of high sensitivity Green Belt land as set out in the Green Belt and Countryside Topic paper, paragraph 4.38. It was on this basis that the Business Park and the adjoining site 67 (see 2014 draft of the Local Plan) were removed. Without sufficient justification the Business Park and the adjoining land (site 67) are once again included on the basis that existing infrastructure is in place and it means it is appropriate for development. In practise, however, Tannery Lane and Papercourt Lane are narrow and lack any pedestrian paths. Moreover, whether or not existing infrastructure is capable of servicing the proposals for the Business Park, this still does not present a robust case for removing the Business Park from the Green Belt when GBC consider it high sensitivity Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3102   Respondent: 10729665 / D. Mills   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockbarn nursery. There has already been approval for the building of 64 apartments and a Marina at this site thereby generating additional traffic. Tannery Lane is extremely narrow, liable to flooding and thereby would struggle to cope with further traffic making access dangerous to those using it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6739  Respondent: 10729665 / D. Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to Send Village being removed from the Green Belt. It clearly provides opportunities for people to access open countryside and nature conservation. Send is surrounded by open fields and has an "open character" thereby making an important contribution to the openness of the Green Belt. If Send village were to be removed from the Green Belt it would illustrate a clear reneging by both local councillors and central government to protect the Green Belt. Furthermore it would open the door for developers to take advantage of this lack of protection through Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2281  Respondent: 10729857 / Lynne Daniel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the development of 2000 new houses at Wisley Airfield, as although we have been told this is more feasible due to the development of the new interchange onto the A3 at Burnt Common – access to this is planned via the Portsmouth Road, which would reduce the Portsmouth Road to a crawl at best

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2280 Respondent: 10729857 / Lynne Daniel Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the building of 45 houses at Clockbarn nursery, as the traffic would have to exit the site either via Tannery Lane – which is a single track road or via the traffic lights in Send, causing even further congestion in the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2278 Respondent: 10729857 / Lynne Daniel Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the development at Garlicks Arch of 400 houses and 7000 sq metres of industrial space, as although the plan mentions a new roundabout to access the A3 in both directions, at Burnt Common, the residents of Garlicks Arch will need to access the new roundabout via the Portsmouth Road and the current roundabout outside the Shell/Waitrose garage. This roundabout and the surrounding road routes are unsuitable for additional heavy vehicles

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the development of 40 houses and 2 travellers pitches at Send Hill, as the road to this site is narrow and the additional volume of traffic will bring significant congestion at the traffic lights at the bottom of the hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5024  Respondent: 10729857 / Lynne Daniel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strong objections to all planning developments within the Send area other than small infills of less than 10 houses. The road system is highly congested, especially at peak times where journeys of a mile can take up to 20 minutes. There should be NO significant developments until such time as the Council has reviewed the road system in Send especially the routes to and from M25, Woking and Guildford and published their plan for the development of the road system to allow for the free flow of traffic within a 5 mile radius of Send.

I also object on the basis that there is no publication detailing the development of sufficient facilities for schooling and medical support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5027  Respondent: 10729857 / Lynne Daniel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In particular

• I object to Send being removed from the Green Belt as I believe that this will allow the Council to approve future developments more easily, resulting in unacceptable levels of congestion and unbearable pollution to the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9479  Respondent: 10729985 / T. Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have received your outlined plan for changes at Burnt Common, Ripley, Wisely and Send. Clandon

I do strongly object. Very strongly object this surely is green belt land which you and our government promised not to take for buildings etc. A promise not being kept – shame – who can we trust?

I object to all erosion of Green Belt.

I object to disproportionate amount of development in one area of the borough

I object to the limited consultation period.

In fact I do object to the 2016 draft local plan which doesn’t have thinking about

So please re think your plan and don’t take the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2117  Respondent: 10730721 / The Milestone Society (Colin Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D1 (Making Better Places) is also to be commend for safeguarding and protecting local distinctiveness, as is your support for the Surrey Hills A.O.N.B.

The Milestone Society is particularly interested in retaining historic street furniture. This importance is recognised in English Heritage's (now Historic England) publication "Designating Heritage Assets - Street Furniture" (2011).

The Society wishes to re-iterate its view that the Guildford Plan should include specific reference to the importance of retaining historic street furniture in road and development schemes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2105  **Respondent:** 10730721 / The Milestone Society (Colin Woodward)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Guildford Local Plan: Strategy and Sites**

Thank you for your letter dated 2nd June 2016.

This Society wrote to you back in August 2014 about the Draft Guildford Plan Consultation. For convenience I attach a copy of this letter.

We are pleased to note that your policy D3 and justifications support conservation of both designated and non-designated historic assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/763  **Respondent:** 10731233 / Linda Aris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the lack of educational provision for the huge influx of planned residents.

I OBJECT to the lack of any immediate provision for doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/764  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1290  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the late inclusion of Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1291  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I OBJECT to the creation of new A3 slip roads at Burntcommon, it will cause huge traffic problems in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to ancient woodland being destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the removal of green belt land in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/638  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3411  Respondent: 10731233 / Linda Aris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It will join up Ripley and Send.

It is a flood zone.

It is ignoring thousands of previous objections.

There is no proven need and demand for traveller showpeople plots in this area.

The increased number of homes is excessive.
It is a clear failure of proper planning process. Area has been targeted disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/2079</th>
<th>Respondent: 10731265 / Liz Turner</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The boundaries proposed to inset the villages of Send and Send Marsh/Burnt Common from the Green Belt. These boundaries double the size of our villages and enclose areas of open spaces that should be retained as Green Belt land and not developed. A presumption for development within these new ‘inset’ areas, would encourage additional development and expansion of the villages in the future and ruin their nature.</td>
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<td><strong>Document:</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Gosden Hill: The scale of this proposal would have a major visual and use impact on the A3 and other local roads. It would affect the appearance of the borough as a predominantly rural area and clog up the A3.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Garlick's Arch (policy A43)</td>
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<tr>
<td>This proposal to build 400 houses and 7,000 sq.m employment space (light industrial/storage, warehousing) on Green Belt land which lies outside the Send Marsh Burnt Common village boundary includes ancient woodland which provides a refuge for deer and other wildlife. This site has never been proposed as a Potential Development Area before and in fact your Council refused an application by ‘Oldlands’ to build 25 houses on part of this site just 2 years ago.</td>
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<td>Development here would be totally inappropriate. It is Green Belt open farmland and the village has no infrastructure to support it. Send Marsh/Burnt Common has one just shop (Waitrose), no doctors' surgery, no schools and the local roads are already congested. The housing, proposal alone would add 960 to the existing population of 2,341, an increase of 41% and would lead to at least an extra 800 cars on our crowded roads.</td>
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<td>The proposed light industrial/storage facility is totally inappropriate and the whole development would destroy the village's demarcation from Ripley, creating urban sprawl.</td>
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<td>In my view, this late and very major change to the Local Plan proposals has resulted in a completely new Plan and has rendered the previous consultation worthless.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. There is no scope to widen Send Road or Clandon Road and would lead 10 major congestion and gridlock.</td>
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<td>The offer of land to create these slip roads is no more than a bribe by the developer to allow the Garlick Arch development proposal, both of which should have been dismissed by G.B.C before the Plan was put out to consultation.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note that I object to:

The number of homes that the Plan expects to deliver.

This target of 693 is much higher than the Council proposed last year and disregards the fact that the borough has such a high proportion of its area designated as Green Belt land. The roads, schools, doctors and hospitals etc. can’t support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2637  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5530  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3744  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

(P.S) I would like to know how the people in all these new houses will get to work? The roads are already gridlocked. Where will all the children go to school? The local schools are already full and overcrowded.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5494  **Respondent:** 10731329 / Sheila Hookins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5415  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5440  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/5471  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5460  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10833  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10843  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10796  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5794  Respondent: 10731361 / Joan Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Secondly, Guildford Borough Council have not provided any evidence for the need of such a huge number of houses to be built in the area.

Thirdly, the former revised Local Plan put forward earlier this summer made a modest provision for housing and industrial development at Burnt Common on what is more or less a brown field site. I object to the current proposal to develop the Garlick's Arch site with 400 houses and industrial space. There is ancient woodland on this site which would be affected even if it were not built over. Industrial units would not provide job opportunities for local people but bring further traffic into the area including heavy vehicles. The building of this volume of housing would increase the volume of traffic on all the surrounding roads which are already hopelessly congested especially during peak hours. The stream which runs across this site and under the Portsmouth Road has flooded on at least two occasions since we have lived in the area. The local infrastructure cannot accommodate the increase in the number of inhabitants in local schools, the provision of medical care or shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5795  Respondent: 10731361 / Joan Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fourthly, I object to the proposed interchange with the A3 at Burnt Common which would encourage traffic to leave the A3 to travel to Woking through Send village. This road struggles to cope with the volume of traffic which it currently does, including huge lorries. The narrow roads of Send Marsh already suffer as a result of a rat runs and lorries using their SAT NAV equipment.

I ask you to urgently reconsider this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11762  Respondent: 10731361 / Joan Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Firstly I object most strongly to the proposal to remove the villages of Send and Ripley from the Green Belt. Green space between settlements is of utmost importance for the physical and mental health of the population. The corridor along the river Wey is an area greatly enjoyed not just by boaters but also by walkers and cyclists and is important as a buffer for wildlife. If these two villages are removed from the protection of the green belt Woking will very soon become joined to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1369  Respondent: 10731361 / Joan Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular I object to policy A42 with the increase of homes from the earlier proposal at Clockbarn Nursery site in Tannery Lane. This road is single track which would create congestion and further problems at the difficult junction with the A247 Send Road. On the assumption that each property would have at least one vehicle and the additional vehicles resulting from the construction of a marina further up the Lane this would be quite out of proportion. This would be a further incursion into the valuable green belt adjacent to the National Trust River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1368  Respondent: 10731361 / Joan Bagnall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch as this will cause over development of Send village. The number of homes is excessive and it ignores all previous concerns raised with regard to the effect on the local infrastructure. It ignores the preservation of ancient woodland and the green buffer this site creates between the current residential area and the busy A3 road. It also ignores the flooding which occurs from the stream.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I further object to Policy A58. The increase in the planned industrial units and warehousing is inappropriate when there are empty sites at Slyfield and contrary to the 2017 Employment Land Need Assessment which shows a reduction in the requirements in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The proposed submission shows that Guildford Borough Council has not taken into account the considerable objections raised to the 2016 plan and has in face increased its proposals ignoring impact on the infrastructure - roads, schools, medical facilities, and the effects of traffic and pollution to the area and its residents and further destruction of the Green Belt which is so vital for the public physical and mental health and cannot be undone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of immediate provision for new schools in the area.
I object to the lack of any immediate provision for Doctors Surgeries in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/223  Respondent: 10731585 / Robert Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/224  Respondent: 10731585 / Robert Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 43a the on off ramp at Clandon as this will increase traffic problem in the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/225  Respondent: 10731585 / Robert Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<tr>
<td>I object to site A57 The Paddocks which I am given to understand is unlawful</td>
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<td>I object to the development at Garlick Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.</td>
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<td>I object to the development at Garlick Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPS16/6320  Respondent: 10731937 / Carol Mullan  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send Marsh Road.</td>
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**Comment ID:** PSLPP16/13164  **Respondent:** 10731937 / Carol Mullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/13165  **Respondent:** 10731937 / Carol Mullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1550  **Respondent:** 10731937 / Carol Mullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1107  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a 'brownfield first' approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1106  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1108  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1104  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1105  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/215  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

I believe there is far too much financial motivation behind Surrey County Council’s plan - and not enough interest in real wants and needs of the people who already live in and pay rates to the county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/217  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

I believe the Surrey CC approach is to build first and then sort out the infrastructure later - so not only the rural nature of our villages is destroyed but we must also endure years of additional traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/216  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.
The road infrastructure to Send Business Park is totally inadequate for an increase in traffic - and any upgrade to them would spoil the rural nature of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development at Garlick Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I object to the development at Garlick Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send Marsh Road.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
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<td>I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.</td>
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<td>Attached documents:</td>
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</table>
1. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow to take any more traffic. How planning permission was given for the marina, I do not know.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. I object to the proposed new interchange onto the A3 at Burnt Common because it will cause severe congestion in Send and adjacent areas which are already very busy and I am not convinced it is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4. I object to the development at Garlick’s Arch for 400 houses and industrial development because it was so suddenly proposed by Guildford Borough Council, without following the accepted guidelines. It is also a site with ancient woodland which should be protected at all cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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7. I object to the development in Send Hill as, again, it is in the Green Belt and is the land is unsafe land fill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the proposed developments at Wisley Airfield, Gosden Hill and Blackwell Farm because the knock-on effect will cause chaos to the surrounding area as the infrastructure needs seem not to have been considered honestly.

2. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to all proposals to build on the Green Belt at Send and elsewhere because it is just that, GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>5. I object to what seems to be the abject failure of GBC to consider developing brownfield sites such as Slyfield.</td>
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<th>Comment ID: PSLPA16/781</th>
<th>Respondent: 10732161 / Anne Bowerman</th>
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</table>
I object to the proposal to build 2000 houses at Gosden Hill Farm. The figures of need for this are grossly over-estimated. It extends the urban area of Guildford into the countryside and will make overcrowded roads and other facilities in the area considerably worse.

I also object to the Blackwell Farm proposal as it will make the almost impossible traffic situation on the Guildford Bypass and other local roads immeasurably worse.

I request that my objections are taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/782  Respondent: 10732161 / Anne Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal relating to the Paddocks in Rose Lane, Ripley. There is no evidence of need for this and there are no exceptional circumstances meriting the taking of this land out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/779  Respondent: 10732161 / Anne Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal to build 400 houses and to the allocation of 7,000 square feet for industrial purposes at Garlick's Arch.

I object to the apparently underhand way in which the Garlick's Arch proposals have been smuggled onto the Plan for the first time, especially as there was so much opposition to the previous plan.

I object to the proposal to build on the Garlick's Arch site because it is prone to flooding and is ancient woodland. The area has flooded many times in recent years and has been classified as of higher risk by the Environment Agency than GBC's own classification.
I object to the fact that the Garlicks Arch proposal will change the nature of the area and local heritage and lead to yet another large number of extra vehicles resulting in yet more overcrowding on the A3.

I object to proposals for the Burnt Common A3/ A247 interchange which will convert a reasonably quiet and peaceful area into a giant Spaghetti junction.

I object to the proposed enlarged interchange at Burnt Common as it will draw very much more traffic along the A247 through Send. This road goes through the residential and shopping centre of the village of Send. It is already dangerous and subject to tailbacks, partly due to directly passing the entrance to the local medical centre and, further along the road, the school which is about to be enlarged.

I object to the proposal to build 45 houses at Clockbarn Nursery because there is already inadequate access to and from Tannery Lane onto Send Road, the A247, which is residential. Access at the Newark Lane end is even worse as it is much narrower there.

I object to the proposal to build at Clockbarn Nursery because Tannery Lane is narrow and twisting. For much of its length it is single track only and has no footway.

I object to the proposed development of 40 houses and two travellers' pitches on a site on Send Hill which is narrow and has no pavements. The Send Road access is shared with a school and there is already congestion at certain times of the day. Accidents occur there through the virtual absence of sightlines.

I object to the proposed development at Send Hill because the land is a disused refuse site and may be contaminated.

I object to the proposed development at Send Hill because development there would spoil an area of natural beauty and cause more delay to traffic already using the road.

I object to the proposal to build houses behind the Talbot Hotel in Ripley. This is over development in a conservation area and will further overload traffic and parking facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1300  Respondent: 10732161 / Anne Bowerman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Wisley Airfield site from the Green Belt.

I object to building any homes, let alone the 2000 proposed, on the Wisley Airfield as it will lead to at least 3000 extra cars in the area and in particular so near the A3 which is already near capacity, leading to frequent tailbacks, especially at the Guildford By-pass, without all the extra vehicles from other sites proposed in the Plan.
I object to the Wisley Airfield proposal as it is in an area of natural beauty with Wisley Lake on one side and the RHS nearby, both of which will lose their attraction if they have a new town on their borders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2650  Respondent: 10732161 / Anne Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable.

I object to any tinkering with the Green Belt as it was intended to be permanent and an essential protection against over-development in rural areas.

I object to the local plan as all the emphasis is placed on removing land from the green belt and then building on it.

I object to the fact that most of a very attractive rural area in the green belt will be smothered in housing from Guildford to Cobham. I object to the failure to find and allocate brown field sites for development rather than Green Belt land.

I strongly object to GBC's proposal for 13,860 new houses without any evidence that anything remotely like this number is needed. It is disproportionate to place 38% of extra houses in the area north east of Surrey. 5,036 houses between Burpham and the M25 is totally unjustified and will change the nature of the area leading to the merging urbanisation of these villages. 693 houses a year is way beyond what is needed and is more than double even than GBC's previous assessment.

I object to the proposals in the Plan being based on figures of demand, the details for which have not been disclosed. This is not justice and would not be admitted in a court of law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3873  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to build 2,000 houses at Gosden Hill for the same reasons as set out in the paragraph above relating to Wisley Airfield (apart from the effect on the RHS). I also object to the taking of another huge chunk of Green Belt to make Guildford into one vast conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3875  Respondent: 10732193 / Leslie Bowerman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for 1850 houses at the Blackwell Farm site for reasons similar to Wisley Airfield and Gosden Hill. There can be no justification for any of these three sites. There is no demonstrable need, no exceptional circumstances and, even if there were, brownfield land should be built on rather than the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3871  Respondent: 10732193 / Leslie Bowerman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal to create a huge new town of 2,000 houses at the former Wisley Airfield which is supposed to be agricultural land and is part of the Green Belt. This proposal is completely out of character with the existing rural environment, will have a devastating effect on the A3 trunk road which is already grossly over-stretched. It will make visiting the nearby Royal Horticultural Gardens difficult to access. The traffic problem will exacerbate the already existing tailbacks which occur every day on the Guildford By-Pass, not to mention similar problems in Ripley and Send. Moreover, to include this site in the Plan is totally inconsistent with planning permission having already been turned down by Guildford Borough Council. It is difficult to envisage the purpose of sneaking it back into the new Plan unless it is to financially benefit the Council or the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3869  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I **object** to the proposal to build 45 houses at **Clockbarn Nurseries** because the extra traffic generated by the building work and by probably 100 extra vehicles from residents of the new houses would bring circulation on Send Road (the A247) to an end at certain times of the day. Access to and from the proposed houses onto the A247 will be difficult particularly for large vehicles as is already shown by traffic accessing the former tannery buildings. The Send end of Tannery Lane is narrow and winding enough now to cause problems, but real problems will be caused by extra traffic trying to access the Newark Lane end of Tannery Lane which is barely wide enough for one vehicle and even more winding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3867  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **object** in particular to the proposal to build on Green Belt land in Send and Ripley at **Garlick's Arch**. It is not justified by any special circumstances or evidence of demand. There is absolutely no way that the building of some 400 houses and the allocation of 7,000 square metres of industrial land at Garlick's Arch can be justified, especially when there is brownfield space nearby and at the Slyfield industrial estate. This site is inappropriate because public transport there is wholly inadequate. It is liable to frequent flooding as happened again only recently. The Environment Agency has assessed the site as being at high risk of flooding. It has Ancient Woodland, including more than 80 ancient oak trees, and much wildlife. It would change the area from rural or at least semi-rural to suburban. There are no plans to improve local schools, medical facilities or utilities to cope with the extra population. Traffic would be virtually impossible both as there are already considerable delays on the road into Ripley, on the Guildford by-pass as is well-known, and along Send Road even without the imminent combining of both the present Send Schools. The proposal to build 400 houses at Garlick's Arch would double the number of houses in this area and thus alter very much for the worse the nature of this historic area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3870  Respondent: 10732193 / Leslie Bowerman  Agent:
I object to the proposed new A3 traffic interchange at Burnt Common because it would be disastrous for the village of Send in that all traffic from London and the M25 to Woking would go along the already overloaded A247 through the residential heart of Send past the village school which is about to be doubled in size with all the traffic that that implies. This is a semi-rural area and I object to it being converted into a huge motorway-type junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I have a number of objections to the proposal to include the site on Send Hill as follows:

I object to this site on the grounds that Send Hill is unsuitable in that it has a one-track road without pavements and with a school at one end and a narrow, steep and winding hill at the other end.

- I object to the inclusion of Send Hill in the Plan as it is in the Green Belt
- I object to Send Hill being included as it would have a detrimental effect on the nearby nature reserve.
- I object to Send Hill in the Plan as it could mean nearly 100 extra cars on this very narrow road which is often blocked due to parents delivering and collecting children from
- I object to Send Hill due to an increase in the risk of floodi
- I object strongly to the Send Hill site as it would disturb the water l
- I object to the Send Hill site in the Plan as it was a registered landfill site used for refuse and slag and is therefore a health ri Methane gas has been recorded there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- I object to Send Hill being included as it would have a detrimental effect on the nearby nature reserve.
- I object to Send Hill in the Plan as it could mean nearly 100 extra cars on this very narrow road which is often blocked due to parents delivering and collecting children from
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to yet more Green Belt development at The Paddocks, Rose Lane, Ripley. Again, there is no demonstrable need and no exceptional circumstances and traffic would be a problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8241  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object generally to the lack of infrastructure. If, which I very much doubt, it is necessary rip up so much Green Belt land in favour of housing, then much infrastructure should be planned for, which in turn will have even more detrimental effect on the rural and semi-rural character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8243  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the road traffic implications of this proposed Plan upon local roads and on roads further afield. One wonders whether the Councillors making these representations ever actually drive along these roads.

23) I object to the effect which these proposals will have on the A3 road in particular which is already beyond capacity, particularly at peak times and most especially on the Guildford By-pass, and which will be infinitely worse if even some of these proposals are imposed on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8228  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposed removal of Green Belt protection from all or any of the villages to the north east of Guildford as it could result in continuous development from Guildford to Without the Green Belt protection for Send there could also be continuous sprawl northwards from Guildford to Woking, making the whole area a vast suburban conurbation and destroying the present semi-rural character. It is beyond comprehension that elected representatives on a Conservative led council can recommend wholesale destruction of what is most attractive about this part of Surrey. One can only wonder if the lure of development money is at the root of this rather than duty to local residents. There are absolutely no exceptional circumstances requiring these villages and sites to be removed from the Green Belt.

- I object to the way the wholesale removal of the above Green Belt protection has been sneaked into the revised plan where there was no intimation of this in the previous plan, especially when there had been such vociferous objection to the earlier plan. There are no special circumstances requiring this. It suggests underhand jiggery-pokery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8233  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure of Guildford Borough Council to identify brown field sites S2, within the urban area. Why build so much on the Green Belt when there is the possibility of brownfield development in more urban areas?

Although I am totally unacquainted with David Roberts of West Horsley, I have seen a copy of his 13-page letter of objection which raises very serious matters, not least about the way the Plan appears to favour profit-making developers.
with no local interest rather than local residents and conservation of the character of the area. This I object to most strongly.

I object very much to the exaggerated proposal to build nearly 14,000 new homes in the Guildford area and over 5,000 between the M25 and Burpham, and in particular the reported refusal to produce evidence of how the purported need for these numbers is arrived at. It is no use saying that the firm which came up with the figures refuses to explain the figures because it would infringe their intellectual property rights. In the absence of explanation this should be refused as evidence. It is well-known in legal circles that where mystery begins Justice ends. The suspicion is that, for whatever reason, the needs of development companies have been given priority over the wishes of the local population.

The numbers proposed, or anything like that amount, are totally unsustainable, especially for Send, Ripley and Ockham where there are no railways, and the bus services would be inadequate. Almost every household would have two cars which would make a bad situation on the roads much worse. The plan is in any event unbalanced across the Borough in that 36% of the plan's housing is proposed for the north-east of the borough which has only 11% of the existing housing. Such an unbalanced situation is grossly out of proportion. The rural roads in this area are narrow, poorly maintained and most have no footpaths and are dangerously unsuitable for the likely traffic from 5000 more houses. Development should be in urban areas where there is sustainable transport. What are the Guildford Councillors thinking of in advocating the delightful area north east of Guildford being turned into a sprawling concrete jungle? They certainly have no mandate for that, as was clearly shown by residents' objections to the first edition of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8242  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unbalanced nature of the Plan in singling out so much of the Green Belt area north west of Guildford for the unnecessary development rather than spreading it more evenly around the Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/295  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object strongly to the proposal to inset Send Business Park from the Green Belt.

I object because this is effectively an old non-conforming user in an area of outstanding countryside next to the tranquil and pleasing River Wey Navigation. It is a sore thumb in an area of natural beauty.

I object because of the very restrictive road access for traffic from both ends of Tannery Lane.

I object because expansion or development of this area detracts from the rural nature of the Green Belt and is totally inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2413  Respondent: 10732193 / Leslie Bowerman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because the previous plan to build 45 houses on the site was bad enough. The extra 15 houses now proposed will exacerbate the problems and shows contempt to the hundreds of Council taxpayers who previously objected to the 45 houses then proposed. No evidence has been produced to show that any houses are required here, especially for the extra number now proposed.

I object because access and traffic problems will be very much worse in Tannery Lane at the junction with the A247 in Send Road and totally disastrous at the Newark Lane junction. Tannery Lane for most of its length is winding and barely wide enough for one vehicle. There is no footpath and houses abut directly onto the road.

I object because the proposal will worsen erosion of the Green Belt in Send.

I object because surface water is already a serious problem and this proposal will make it very much worse.

I object because the proposal will detract from countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2414  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object because the proposal ignores all the thousands of objections made by local people and makes things much worse by including even more houses, which looks like a punishment of local people having the temerity to object.

I object because there is no proven demand for travelling show-people in this location.

I object because this site is beautiful Green Belt land and there are no exceptional circumstances to merit removing this protection.

I object because it is grossly excessive development of our village and the number of houses proposed is overwhelmingly too many.

I object because this is a site of wonderful ancient woodland that dates back to medieval times.

I object because this proposal will connect Ripley and Send and defeat the key purpose of the Belt.

I object because the site often floods and is currently a Flood Zone 2 allocation.

I object because the site is contaminated with lead shot which has been accumulating for 50 years.

I object because the enormous amount of traffic which will be generated by this proposal will catastrophically clog up the roads of both Send and Ripley, many of which can barely take two lines of traffic. It will also make the clogging up of the nearby Guildford By-pass disastrously worse. One wonders whether the proposers of this policy ever use the by-pass, particularly travelling south, when bottle-necking can extend right to Burpham even on an ordinary weekday.

I object because potential objectors have never been shown the figures on which the proposed number of additional houses is based and which can only be of benefit to those who stand to profit from such proposals. Justice must not only be done but must be visibly and manifestly be seen to be done, which is not possible without seeing the figures on which the proposal is based.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2415  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal as it was deleted from the 2014 draft because of the number of objections previously lodged and nothing relevant his since happened.

I object because the word ‘maximum’ for industrial use (which was more than enough already) has unbelievably been altered to ‘minimum’ which means that there would be an obligatory 7000 square feet of building on the site and no top limit to the industrial buildings allowed in the new plan. This cannot be right when there has been a decline in the demand for industrial land.

I object because this site was deleted from the 2014 draft as a result of all the objections. It cannot now be right that it has now been reinstated greatly enlarged. Something very sinister must be going on for this to be done.
I object because there is absolutely no need to build industrial or warehouse buildings in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units. One wonders what is going on.

I object because the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole Borough, not a huge over-allocation of 10 hectares at Send in the Green Belt. Again, it appears that a huge unnecessary project is being proposed to destroy this beautiful part of the Green Belt, to nobody’s benefit but those with an interest in development.

I object to this proposal because it will lead to gridlock both on small local roads and on the Guildford By-pass.

I object to this proposal because it will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1589  Respondent: 10732289 / Nigel Goatley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council's Proposed Submission Local Plan

I have perused most of the latest Local Plan and was dismayed to see that it effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any infrastructure improvements to either the A3 or local roads! I live in the Send/Ripley area and all these developments would have a hugely detrimental effect on local roads in this area. Although Ripley has the A3 as a bypass, to try to get onto the A3 London bound from Ripley at peak times requires a lot of patience!

I was also horrified to learn that the local villages of Clandon, Ripley, Send and Wisley, as well as other villages in Surrey, are to be removed from the designation of "Green Belt" which will allow unlimited future development and result in the destruction of our lovely rural villages!

I OBJECT to the above-mentioned villages being withdrawn from the Green Belt as they provide an essential buffer from Woking and Guildford becoming one large conurbation. Central government and local councillors both gave election promises to protect the Green Belt from further erosion and have reneged on this.

I OBJECT most strongly to the development of Garlick's Arch opposite Send Marsh Road's junction with the Portsmouth Road for housing and industrial development on land which is currently agricultural Green Belt. This is already a very busy junction and causes long delays at peak times. Further housing would also add to the already serious problem of lack of school places and even longer waiting time for doctor's appointments.

I OBJECT to the proposed new interchange with the A3 at Burnt Common as this would have a major impact on traffic through Send and the surrounding areas.

I OBJECT to the proposed development of 40 houses and 2 travellers’ pitches at Send Hill. This site contains documented unsafe landfill waste which is currently vented. The roadway is also single width providing insufficient access. (Again more houses would have an effect on schools and the Villages Medical Centre.)
I OBJECT to the proposed building of houses at Clockbarn Nursery. This junction with Send Road would cause further traffic problems and there is inadequate access as Tannery Lane is very narrow with many tight bends. Again, further houses would have a detrimental effect on schools and medical facilities.

I OBJECT to the inclusion of Wisley airfield site as it has already been rejected by Guildford Borough Council. The building of so many homes and the enormous amount of infrastructure it would require would have a tremendous impact on local roads and, again, facilities, schools, hospitals etc.

I OBJECT to the suggestion of 2,200 homes on Gosden Hill site at Glandon and Burpham. Again, this would require major infrastructure works and would greatly increase the volume of traffic on local areas of Glandon, Burpham, Ripley and Send.

All the suggested developments would require significant improvements to the A3 and local roads and would contribute to the destruction of our rural villages!

I hope that my comments will be read by the inspector!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/1258  Respondent:  10733089 / Chris Barber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Similarly Local Development Plan(s) have been made based on the assumption of ever-more migration into this country and into Surrey but the Brexit vote will mean that some companies will now move to the EU so we do not now need to believe that the huge influx of "people for local jobs" will happen. Look at the empty Guildford High street shops and local offices to let if you need confirmation.

Theresa May says she will make a better Britain. She said this week: 'Let us redouble our efforts. And let us make sure we put this time to good use, to build the support we need to go to the country in four years’ time, and not just win, but win big.

'Now, more than ever, we need to work together, to deliver on Brexit, to build a country that works for everyone, and to truly unite our Party and our country.'

Changing the face of our Surrey villages does not concur with her new statement of intent. Think again and make a stand for a re-think from Mrs May and her government.

I also object on the basis that there is no publication detailing the development of sufficient facilities for schooling and medical support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/2293  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the development of 2000 new houses at Gosden Hill Farm as that effectively could mean 4000 more cars using the congested A3 and surrounding road infrastructure, and if it does proceed must first have the new schools and new medical centre to support that development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2292  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the development of 2000 new houses at Wisley Airfield, as although we have been told this is more feasible due to the development of the new interchange onto the A3 at Burnt Common – access to this is planned via the Portsmouth Road, which would reduce the Portsmouth Road to a crawl at best

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2291  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the building of 45 houses at Clockbarn nursery, as the traffic would have to exit the site either via Tannery Lane – which is a single track road onto Send Road which is already congested at school and commuting times, causing even further congestion in the area especially Burnt Common roundabout and Old Woking mini roundabout

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2289  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the development at Garlick’s Arch of 400 houses and 7000 sq m of industrial space, as although the plan mentions a new roundabout to access the A3 in both directions, at Burnt Common, the residents of Garlick’s Arch will need to access the new roundabout via the Portsmouth Road and the current roundabout outside the Shell/Waitrose garage. This roundabout and the surrounding road routes are unsuitable for additional heavy vehicles

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2290  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses & 2 travellers pitches at Send Hill, as the road to this site is narrow and the additional volume of traffic will bring significant congestion at the Send Hill traffic lights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5029  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strong objections to all planning involving large (20+) developments within the Send area. The road system is extremely congested for 2 hours each morning and 3 hours each afternoon into evening with the three lane A3 full to capacity often with 6Km queues both ways encouraging vehicles to then use the Portsmouth Road Burnt Common roundabout to Ripley grid-locking that as well. The plans for Wisley Airfield, Gosden Hill Farm and Garlick’s Arch are all planning to use the Burnt Common area leading to the proposed new 4 way A3 access. Absolute madness without full infrastructure changes to ALL local roads, schools, medical centres etc. The Brexit vote clearly showed that British people are sick and tired of unthinking and uncaring bureaucracy from Government which is being fulfilled by pressurised councils. The Brexit vote demonstrated people will now stand up to this; it is now Guildford Borough Council’s opportunity to also say NO.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5034  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular

- I object to Send being removed from the Green Belt as I believe that this will force the Council to approve future developments on green belt land not included as identified sites in the current local draft plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/2313</th>
<th>Respondent: 10733121 / F. Buchhaus</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<tr>
<td>I object to:—</td>
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<td>GBC using faulty and out of date statistics and not considering the GBC transport assessment of June 6th.</td>
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<td>Send road is already overloaded with traffic, it will become gridlocked increasing noise and pollution levels even further.</td>
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<td>Proper use of Brownfield sites ie Slyfield mean that this green belt area is not needed for industrial development</td>
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<tr>
<td>Plans for 64 apartments and a Marina are already in place</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Send village being removed from the green belt, the building of 400 houses and industrial space at Garlicks Arch</td>
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<td>I object to 45 houses at Clockburn Nursery</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to:-

The planned A3 interchange at Burnt Common which will turn Send road into a rat run to Woking

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4429  Respondent: 10733121 / F. Buchhaus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to:

40 houses and two travellers pitches at Send Hill

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9633  Respondent: 10733121 / F. Buchhaus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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GBC circumventing proper protocol under Regulation 18 by using a shortcut without proper consultation

I object:- to GBC failure to consider a wider and thinner spread of housing over a greater number of villages

I object:- to GBC not considering development options less damaging to our way of life

I object:- to GBC not reevaluating future housing demand in light of Brexit

I object:- to GBCs attempts to avoid proper consultation of all parties concerned as laid down by statute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1311</th>
<th>Respondent: 10733281 / J. Cornford</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the above on the grounds of its lack of planning for infrastructure to accommodate the large number of houses mentioned.

There is no mention of plans to cope with increases for school places which would be flooded and medical facilities and surgeries.

The main road which runs through the centre of Send, A247, is already very congested at times and would just not be able to cope with the extra traffic which would be caused.

I also object to Policy A44 where 40 houses and 2 travellers pitches would be built. The access to the site in Send Hill, a lane which is very narrow and has 2 very tight bends which would be very hazardous.

Finally the idea of the destruction of the green belt in this area is ridiculous. This part of the green belt is absolutely essential for dividing Guildford from Send and Woking, alternative it will mean a completely built up area from Guildford to London.

My husband and I have lived in Send in this house for 35 years. We have walked every public footpath and know and love every part of this area which is very special although my husband has passed away I know that he like me would wish future generations to have the same opportunities to enjoy the Green Belt as we have done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the final draft local plan.

I would like my objection to be seen by the Planning Inspector.

Removing Send and Ripley from GREENBELT would be disastrous for communities and nature. Policy A43 at Garlick's Arch in particular must be rejected.
The boundaries between Ripley - Send - Woking - Guildford have been straining for some time but there are tiny pockets of GREENBELT between them that just about keep precious village life and conservation of our flora and fauna alive.

The policy A43 would demolish this - and to hold the responsibility for this is a great burden - I urge you to be strong and sensible and protect the history and nature and soul of our community.

Precious woodland and wildlife would be lost forever. The traffic congestion is already very difficult in peak hours - there are a large number of elderly people and families with young children in the area. Giving permission for this proposal would not only endanger the lives of residents, but ruin the village communities of Ripley and Send and Burnt Common.

The noise of traffic from A3 already intrusive but with a new interchange it would be unbearable and not healthy to live with.

If any warehousing is really necessary then Slyfield is the much more logical option.

Garlick's Arch contains ancient woodland and rare and precious wildlife. Nesting birds not commonly seen in the South East. We have flora and fauna to be proud of and it is ours and your duty to protect it. To keep this community safe. There is neither the need nor infrastructure to support a housing development of this magnitude.

GBC have not been honest and some council members downright underhand.

I would certainly question the motives and morality of Councillors Spooner in the proceedings as I know many people do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/1444</th>
<th>Respondent: 10733409 / Ruth Hunter</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The policy A43 would demolish this - and to hold the responsibility for this is a great burden - I urge you to be strong and sensible and protect the history and nature and soul of our community.

Precious woodland and wildlife would be lost forever. The traffic congestion is already very difficult in peak hours - there are a large number of elderly people and families with young children in the area. Giving permission for this proposal would not only endanger the lives of residents, but ruin the village communities of Ripley and Send and Burnt Common.
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GBC have not been honest and some council members downright underhand.

I would certainly question the motives and morality of Councillors Spooner in the proceedings as I know many people do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1569  Respondent: 10733409 / Ruth Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 which ignores the hundreds of previous objections and will worsen access and traffic problems in Tannery Lane and the A247 junction.

These policies will all make the erosion of the Green Belt in villages worse and will negatively impact on the countryside, flooding on roads and defeat the purpose of the Green Belt and join up existing villages.

The Council have behaved in an underhand way throughout and broken promises to the local electorate. Please reject these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1566  Respondent: 10733409 / Ruth Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the Policy A43 at Garlick's Arch. When the last policy was proposed, thousands of us objected and the Council have showed contempt for us by expanding the new proposal to include more homes, industrial warehousing and Travelling Showpeople plots. This greed and disrespect for residents and our precious Greenbelt is disgusting and I hope very much the planning inspector will reject their proposal.

Burnt Common and Garlick's Arch are beautiful permanent Green belt with ancient woodland and wonderful wildlife that we need to preserve for future generations.

The area is subject to flooding and proposal A43 will cause over development as the number of homes is quite excessive. It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1567  Respondent: 10733409 / Ruth Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Policy A58. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites an industrial units. The impact on our small roads will create traffic gridlock and be dangerous for the many children who walk and cycle to and from school and the local playgrounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1568  Respondent: 10733409 / Ruth Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Policy A58. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites an industrial units. The impact on our small roads will create traffic gridlock and be dangerous for the many children who walk and cycle to and from school and the local playgrounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1685  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to the development of 2,000 houses at Wisley Airfield as that will greatly increase traffic congestion and access problems between Ripley, the A3 and the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1683  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the development of 45 houses at Clockbarn Nursery (PolicyA42) because of poor access and traffic volume. Tannery lane is very narrow, has a tight junction with Send Road and will also have to accommodate extra traffic from already approved plans for a Marina and for 64 houses at The Tannery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1681  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the development of Garlick's Arch site (Policy A43) as it includes ancient woodland, is in Green Belt protected by NPPF, and is subject to flooding.

2. I object to the development at Garlick's Arch site of 7,000sq. m. for industry and warehousing as the Employment Land Needs Assessment 2015 shows an 80% reduction from previous draft plan.

3. I object to the development at Garlick's Arch site of 400 houses as it will cause further traffic stress at Burnt Common and put additional pressures on local infrastructure, doctors and schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1682  Respondent: 10733665 / David Elvey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed new interchange with the A3 at Burnt Common (Policy A43a) because it will greatly increase traffic along the A247 and will cause considerable congestion and gridlock at Burnt Common and in Send in peak periods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1684  Respondent: 10733665 / David Elvey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the development of 40 houses at Winds Ridge/Send Hill (Policy A44) as subsoil contains unsafe land fill waste.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3668  Respondent: 10733665 / David Elvey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of Send and surrounding area from the Green Belt as they provide a green buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to Guildford Borough Council not identifying sufficient brownfield sites, nor including the Town Centre Masterplan in the overall Local Plan and thereby eliminating or reducing the development needs outside current urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. I object to the Strategic Housing Market Assessment requirement of 13860 homes as students and economic needs have been inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/708  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to all the proposed developments in Send as they are significant changes from 2014 and full consultation under Regulation 18 has not been made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3066  Respondent: 10733729 / Kevin Beauchamp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send I am appalled at the proposals put forward in the Local Plan. The plan is supposed to be the result of the consultation process between the Borough Council and its residents. We have already put forward our views during the process and have been totally ignored. It is not surprising that the people of this country have lost faith in our politicians (you guys). My objections are covered in the following five points:

1. I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renege on those promises.

1. I object to building 45 houses at Clockbarn Nursery. This is a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

1. I object to building 400 houses and 7000m2 of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial
centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

1. **I object to the development of 40 houses and 2 travellers’ pitches at Send Hill.** Another ridiculous idea. As with the Clockbarn proposal, the affect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic.

1. **I object to a new interchange with the A3 at Burnt Common.** I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

I trust you will consider my comments and those of all the other residents in Send and the surrounding villages before inflicting any further irreversible damage on our communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6646  **Respondent:** 10733825 / Karen Thornton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to the 45 houses at Cockburn Nursery;** Tannery Lane is pretty dangerous to drive down as it is. its very narrow in parts and with sharp bends. The Junction onto Send main road is extremely hazardous as cars try to get onto the main road. This will be even worse when it's already dangerous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6647  **Respondent:** 10733825 / Karen Thornton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
<table>
<thead>
<tr>
<th><strong>Comment ID:</strong></th>
<th>PSLPS16/6649</th>
<th><strong>Respondent:</strong></th>
<th>10733825 / Karen Thornton</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to **400 houses and 7000sq meters if industrial space at garlic field**

It floods really badly and is covered by ancient woodland. There is no need to build an industrial site here when there are plenty of other sites in Guildford e.g. Slyfield. There are plenty of brown field sites that can be built on therefore there is no need to build on Greenbelt. Also Guildford's housing requirements have been exaggerated but they won't disclose their calculations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th><strong>Comment ID:</strong></th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to **a new interchange with the A3 at Burnt Common**, if this happened Send would have to take on the traffic from the proposed 2,000 at Gosden Hill, 2,000 at Wisely Airfield and 1850 at Blackwell Farm. There will be a huge amount of increased traffic going through Send as people use it to get to and from the A3 and the M25, Guildford and Woking. This would mean gridlock on an already overloaded road. Noise and pollution levels would be be made a lot worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the development of 40 houses and 2 travellers pitches at send Hill
this would be completely inappropriate again because of the single track country lane that meets potters lane. Also, the subsoil on the site contains documented unsafe land fill waste. Please contact resident [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] for a more detailed objection specifically about this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13963  Respondent: 10733825 / Karen Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Send being removed from the Green Belt  Mainly because Green belt land was always meant to be permanent, and there is no special circumstance that could ever justify taking it away. The Government gave a promise to protect the greenbelt...Taking the green belt status away goes completely against that. Eventually there will be nothing left as developers will move in with nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1626  Respondent: 10733825 / Karen Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I would also like to add that any housing will not benefit any of the local community at present unless 1) The quantities are reduced significantly . 2) It is built as affordable housing, which at present is not in the interest of developers to build houses like this,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1506  Respondent: 10733921 / Pamela Maynard  Agent:
I am writing with regard to the Local Plan and the resulting effects on the villages and Surrey's Green Belt.

I object to the removal of Send Village from the Green Belt. If developers move in and use Green Belt for housing, industrial, etc. it will mean the merging of the Send/Ripley/Glandon area with Guildford, thereby making the area one urban area as opposed to villages with open spaces relative to the population.

I object to the proposed building of 45 houses at Clockbarn Nursery in Tannery Lane, Send. The access to Tannery Lane at present is hazardous to say the least and the prospect of a further influx of traffic entering and exiting onto Send Road will cause an enormous amount of disruption in the village which is busy enough already.

I object to the proposed new development of 40 houses and two travellers' sites in Send Hill. Again, Send Hill is on a busy junction and extra traffic will again cause disruption. This area has permanent Green Belt status within an area of beautiful countryside, not land to be used for development.

I object to the building of 400 houses and 7000 square metres of industrial space at Garlick's Arch and the proposed new interchange with the A3 at Burnt Common. It is grossly indecent to utilise Green Belt land to build this amount of dwellings and provide for industrial. There are brownfield sites in the area that can be allocated for industrial use. This site is prone to flooding and whereas much work was carried out in the Send Marsh area in the 1980's to prevent flooding in the area, this development would put pressure on the current safety levels. This particular Green Belt site has conservation issues in that it is covered in ancient woodland.

The current infrastructure cannot cope with this influx. I do not merely refer to services, but also to the local schooling, doctors' surgeries, local travel and road usage itself. If these developments were allowed to proceed, it will be nigh impossible to move on the roads in the immediate area - they are proving to be difficult now without any new influx.

Promises were made by Local Councils and Central Government to protect the Green Belt and if these promises are not kept, developers will take advantage and our Green Belt will be no more.

I urge you to take note of the objections listed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1843</th>
<th>Respondent:</th>
<th>10733921 / Pamela Maynard</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A42 due to the increase from 45 to 60 homes which equates to a third more in density and is ignoring previous objections by local people to the original plan for Clockbarn Nursery. It will increase already difficult traffic problems at the junction of Tannery Lane and the A247. It will affect what is at the moment nice open countryside and spoil another part of the Green Belt area. Added to this is the risk of surface water flooding which is already experienced across the Broadmeads. Surely it is not wise to increase this threat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1844  Respondent: 10733921 / Pamela Maynard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 which now refers to 400 homes and 6 Travelling Showpeopft plots. Despite the thousands of objections already lodged, this number of dwellings on beautiful Green Belt is obscene and who has suddenly decided that there is a need for Travelling Showpeople plots? Ripley and Send will merge into one anothed and our villages with, much historical background, will fade into non-existence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1845  Respondent: 10733921 / Pamela Maynard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 which requests allocation for a minimum of 7,000sq.m. of industrial or warehousing. There is not a requirement for this sort of space as demand has been declining and the increase in traffic movement will just add to what is becoming a chaotic area for road travel. I work within an industrial warehousing complex and know of the problems that arise from this sort of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/561  Respondent: 10733921 / Pamela Maynard  Agent:
I object to the proposal that Send Business Park is now taken out of the Green Belt, altogether as the area in which it is situated is true Green Belt with much cherished countryside adjacent to the River Wey Navigation. Again the traffic levels along Tannery Lane are bad enough without adding to the problem. We cannot and must not lose any more of our Green Belt to developers who do not have the best interests of the local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to building 45 houses at Clockbarn Nursery because there is very poor access to the main road. Also Tannery Lane is far too narrow. Planning permission has already been given for a Marina and 64 Apartments at the Tannery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 400 houses and 7000 sq. meters of industrial space at Garlic’s Arch. The industrial space is not needed in this area. I do not believe the is the demand for this number of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6134</th>
<th>Respondent: 10734113 / A.H. Finn</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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I OBJECT to the proposed new interchange with the A3. With the proposed 2000 new houses at Wisley Airfield, 2000 house’s at Gosden Hill Burpham and 1800 at Blackwell Farm at Blackwell Farm. Such large developments it will cause a large volume of traffic through Send Road.

I REQUEST THAT MY COMMENTS ARE SHOWN TO Planning Inspector who will decide

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I OBJECT to the proposed development of 40 houses and 2 Traveler’s pitches at Send Hill Site is not suitable for this due to Send Hill being very narrow at this point

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/6084</th>
<th>Respondent: 10734241 / A. Cude</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to express our grave concerns regarding the proposed housing & road development in the Send / Burnt Common / Send Marsh area.

There are several reasons for our concern which we will explain here.

However, the worst impact in our opinion will be to traffic. The traffic through Send is already chaotic in the mornings & evenings. Caused by the volume of cars heading to and from Burnt Common Roundabout, heading for London M25 (via Ripley village), Guildford, both via the A3 and to/from Woking. Sometimes the traffic queue from Burnt Common roundabout tails back into the middle of the village, even beyond the Send Marsh Road junction. This is compounded by thoughtless parents parking willy-nilly all around the infant school dropping off or collecting their kids. Send surgery carpark (for surgery patients) is also nearly always full of 'school run' vehicles, meaning patients have nowhere to park. This will get ten-fold worse when St Bedes School also moves to the same site. Tannery lane crossroads is chaotic and dangerous at the best of times -this too will get much worse along with the Send Marsh Road cut through used by many drivers to avoid the Burnt Common roundabout - both already being accident black spots.

Added to this we have the Send Hill and Potters Lane problem. This route is already used heavily as a cut through from the northbound A3. It is very narrow around the cemetery and almost impossible to pass at times due to bad parking etc. Also the worrying prospect of traveler sites (and face the facts, we all know what that means) in one of the nicest and most peaceful place in the village. Many people have paid a fortune to be laid to rest in the cemetery. Who will guarantee that it will be kept clean, tidy, quiet and respectable especially when a funeral is taking place?

We notice a new slip road is proposed just south of the A3 at Tithebarns Lane junction, to join the A3 northbound so as to not necessitate passing through Ripley. This will not work! It will simply create peak time traffic jams in Clandon Road back to Burnt Common roundabout and into Send Barns Lane due to the volume of vehicles trying (unable) to join the traffic jam on the already snarled up A3 heading northwards. Note: The existing peak time northbound traffic on the A3, already tails back southwards from the M25 entry slip, back past the northbound Ripley entry slip road and sometime almost back to the Burpham junction. Peak time traffic joining the A3 northbound at the new proposed slip road will simply be trying to join a traffic jam.

If ever there's a major incident on the A3 or the M25, this entire area just becomes one gigantic car park which will only ever get worse if huge extra volumes of traffic are encouraged.

Whoever has studied this, clearly has never had to use (& has no knowledge of) the roads around this entire area at peak times.

Also please bear-in-mind there are hundreds of very elderly people in the Send area who need to negotiate these roads on foot, and also who have no access to PC's & emails etc to express their worries and heartbreak at these proposals. Our once beautiful village & surrounding area being swallowed up and ruined as London continues to spew outside of the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

This is designated existing green belt land. It is supposed to keep rural areas 'green'. But clearly 'Green belt' is a meaningless term when it suits the government to de-classify it to steamroller all over it regardless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6088  Respondent: 10734241 / A. Cude  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As you will be fully aware, existing drainage & sewerage infrastructures barely cope with the volume of homes in the immediate area having already been stretched beyond their limits due to housing developments over the last 30 / 40 years - which would only ever be alleviated by massive civil engineering reconstruction works including new handling plants etc, which clearly haven't been considered or addressed in these development proposals. 485 houses will probably mean at least 1000 people & 500 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5529  Respondent: 10734497 / Pat Spall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am very disappointed that there are plans to remove Send and Ripley from the Green Belt. It would appear that the whole area will be overrun by both Guildford and Woking.

It would seem there are many more suitable areas for such a large scale development than Send and Ripley.

The around traffic is a great problem in this area. It would appear that not sufficient thought has been given to the amount of heavy traffic necessary if the proposed developments take place and also the increased amount of cars from houses built. The whole area will become grid locked.

I really hope that some revised plan will be sought of Send and Ripley will once again be considered Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3533</th>
<th>Respondent: 10735777 / S. May</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3534</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6831  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6833  Respondent: 10735777 / S. May  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14786  Respondent: 10735777 / S. May  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14783  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14784  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14785  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14790  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14792  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14787  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14788  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14789  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14781  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14782  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14779   Respondent: 10735777 / S. May   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to
being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/14780 | Respondent: 10735777 / S. May | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated
between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2448  Respondent: 10735809 / D. Blackman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local planning of even more housing in Send/Ripley Villages.

There is never any infrastructure when housing developments are being planned. Local authorities seem to forget, lack of primary and secondary schools, doctor surgeries, road congestion, pollution and parking.

The villages alone cannot cope with more residents let alone a huge increase in even more traffic!!!!!!

Also, since when has it bee possible to build on Green Belt! Green Belt areas are there for a reason, therefore should not be built upon, EVER!! Local councillors and central government gave a clear election promise to protect the Green Belt areas!

I am so disgusted with these plans; who would even wish to build upon Greenbelt areas within beautiful rural villages. There seems to be too many corrupt people working within this council, whom are only interested in earning a back earner!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3441  Respondent: 10736545 / Patricia Midson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to houses on Clockbarn nurseries Send Rd is already a nightmare for the traffic that uses it already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3442  Respondent: 10736545 / Patricia Midson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Garlick Arch. The site floods and it is covered by ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3443  Respondent: 10736545 / Patricia Midson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

A new interchange at the A3 Burn Common is too awful to contemplate. You are just going to wipe Send Village into oblivion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Hill development it contains unsafe landfill waste as documented at GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3445  Respondent: 10736545 / Patricia Midson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In fact I object to GBC developers councilors making any awful changes as they all are to our lovely village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7539  Respondent: 10736545 / Patricia Midson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send village being removed from green belt which was intended to be permanent.
Local councilors and government gave a clear promise to protect the Green Belt are we to lose our trust in GBC councilors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3569  Respondent: 10737985 / Jeremy Taylor  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the content of the local plan and want my comments to be seen by the Inspector. My reasons are as follows:-

1. **I OBJECT** to these areas of land being taken out of the Green Belt i.e. the land behind the school including playing fields and woodland, the land to the right of Cartbridge by the river Wey Navigation up to the new boundary fence with Vision Engineering and the land to the left of Cartbridge going up to the old depot on the Wey Navigation. This would in effect lead to the destruction of the village of Send, removing it from the Green Belt.
Belt and making it part of an urban sprawl. It is my understanding that the Green Belt is an area to be protected for perpetuity for our children and our grandchildren. It has remained protected for the benefit of every one, not just those people who live nearby but also visitors from London and other urban areas who visit to cycle, walk, picnic and to enjoy the tranquillity and closeness to nature in the countryside. It has yet to be demonstrated that there are “exceptional circumstances” for building on Green Belt land.

2. **I OBJECT** to the proposal to use land at “Garlick’s Arch” on which to build 400 houses and 7,000 sq m of industrial and warehousing. This would also remove this land from the Green Belt and it has a particular conservation sensitivity since it is covered in ancient woodland and trees over 500 years old would be endangered along with the protected wildlife which lives there. The proposed industrial development has not been identified as being required by the latest Employment Land Needs Assessment (2015) which actually indicates a reduction of 80% in required employment floor space from the previous draft plan.

3. **I OBJECT** to the proposals for Garlick Arch as it has been indicated that this would require a new 4 way interchange onto the A3 at Burnt Common and if there has been a thorough investigation into the traffic congestion which already exists in this area, it must be apparent that this would cause traffic chaos. It is also my understanding that no firm proposals or time scales for changes to any of the roads in this area have been agreed. How can this proposal go ahead without any commitment to any changes in the road layout and even if these do go ahead, they will do nothing to alleviate the major traffic havoc which will ensue and will severely increase if any of the proposals for Send and Garlick Arch go ahead.

4. **I OBJECT** to the addition of new sites, i.e. land west of winds ridge, send hill and Garlicks Arch, to the increase in the number of houses to be built and to a major new road junction which were NOT previously included in the Borough Plan and which have not been consulted upon previously. These areas have NOT been subjected to full consultation under Regulation 18 which I believe invalidates the whole process. This proposal would again mean that an area of the Green Belt would be lost. It is also my understanding that the subsoil of the existing site contains documented unsafe land fill waste.

5. **I OBJECT** to the inclusion of two more Travellers pitches. I am not aware of any research that indicates the need for these in this area. In my view, if some members of society choose to live in caravans and to travel, that is their right. What I am at a loss to understand is why “travellers” need a permanent pitch. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

6. **I OBJECT** to the increased level of building and inclusion of travellers sites which is included in the “New local plan” since I believe that it does not take into account a realistic appraisal of the additional infrastructure that would be required to meet all the needs which would arise. Hospital services, GP surgeries, schools, transport etc.

7. **I OBJECT** to new homes being built on greenbelt land when the availability of brownfield sites has not been thoroughly explored. The plan indicates that 40% of the housing will be “affordable”. Please can you provide a figure of what you consider constitutes “affordable”. If the planning committee has been aware of the research done by the BBC they will know that the shortage of housing in the South East is due to lack of social housing for those who cannot afford to buy at any price and the fact that private landlords are charging more than local authority housing benefit will pay. This development will do nothing to alleviate the housing difficulties which exist in London and the surrounding areas. It will merely serve to line the pockets of the developers and possibly the County Council who can benefit from the “sweetners” demanded by them.

8. **I OBJECT** to the huge amount of housing and the areas of land on which it is proposed to be built. It is well known to all the residents of these areas that they flood every time there is heavy rain. Building houses and industrial units on land prone to flooding is not only distressing to the residents in the event that it occurs but also has a knock on effect on the rest of society whose insurance bills increase every time the insurance companies have to pay out millions of pounds.

Overall, I am deeply upset, disappointed and feeling betrayed by the local Councillors who I thought were elected to and would be committed to protecting my home and environment, as well as protecting the green belt for our children and their children. Since Monica Juneja and Mansbridge have left the Council (under a cloud of proven fraud and suspicion) I had hoped for a more open and honest Council who would listen to the wishes of the electorate and investigate their genuine concerns without prejudice but I am finding no evidence that this is so. Local councillors and the government gave a clear election promise to protect the green belt but it seems that both are prepared to renege on it for the sake of a “quick buck”.
I find it difficult to express how disillusioned and let down I feel by my local representatives. The people to whom I have entrusted the safeguarding of my home, environment and provision of essential services and who have failed to do so spectacularly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/383  Respondent: 10741729 / Jean Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2 at paragraph 4.3.15 I object to this proposal to inset Send Business Park from the Green Belt because:-

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

Tannery Lane is a one track road which is unable to accommodate any increase in traffic in both directions.

Here again the openness of the Green Belt would be impinged upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2871  Respondent: 10741729 / Jean Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to policy A 42 because:

It seems that no notice has been taken of the original objections and to the reasons not to build 45 homes and this has now increased to 60 new homes. The problem remains and will be increased that it will worsen access and traffic problems in Tannery Lane and at the A247 junction and will increase pollution. It will have a “knock on” effect on the whole area in terms of traffic congestion and pollution. It impinges on the Green Belt which I am led to believe, both Guildford BC and the current government have given a commitment to protect. It will impact on open countryside views from the River Wey
Navigation and will exacerbate the existing problem of surface water flooding. There is no indication that any of the proposed houses will be affordable to local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch, Send Marsh, Policy A43

I object to Policy A 43 because:-

This land is part of the permanent Green Belt and no evidence of “exceptional circumstances” has been demonstrated which justify the change of use of greenbelt land. If I am wrong please advise me on the “exceptional circumstances” which exist. This area is subject to frequent flooding and is currently a flood zone 2 allocation. Historically it has existed as an ancient woodland since the time of Elizabeth 1. Are you suggesting that we totally disregard our English heritage for the sake of building homes on an area which already suffers from frequent flooding and for which there is no proven need for them to be built? Flooding is not only devastating for those it affects but has the knock on effect of additional costs to the local authority as well as insurance companies and it is the taxpayer who ends up footing the bill. This area is already overloaded by traffic and the additional homes and sites which are proposed will only add to traffic congestion and block up even further the roads of Send and Ripley. I require to see the evidence that indicates that there is a demand for Travelling Showpeople plots in this location.

The addition of 400 homes will seriously cause over-development of the villages of Ripley and Send, in effect joining them and defeating the key purpose of the green belt. The issue also remains of the inability of the current infrastructure i.e. schools, GP’s and hospitals to cope with this influx of additional people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burnt common Policy A58

I Object to Policy A58 for the following reasons:-

It seems that having been deleted from the 2014 draft due to all the objections raised, this proposal has magically been put back in again, however since that time there has been a decline in demand for industrial land. The need for “industrial land” has yet to be demonstrated. It is the case that both Slyfield and Guildford have empty sites and industrial units available.

The 2017 Employment Land Need Assessment shows a reduction in industrial demand to 3.9 hectares for the whole borough not a huge allocation of 10 hectares at Send in The Green Belt. The already existing problems with regard to traffic congestion will become ever more problematic and gridlock is sure to be created. Villages which are currently unique and sensitive to the needs of their own communities will be joined up and negate the whole concept of the green belt as well as destroying the many and valuable services provided mostly voluntarily by residents from these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/375  Respondent: 10741793 / Dianne Mathie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/374  Respondent: 10741793 / Dianne Mathie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the over estimated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need and you really should take this into consideration for your figures to be true.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/371   Respondent: 10741793 / Dianne Mathie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you to log my objection to the removal of Send from the Green Belt not least because the village and it's countryside provides a necessary buffer between Woking and Guildford but also because I really do feel totally let down by everyone of those pushing this plan forward.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. Please do not do this to an area which is so beautiful.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all it's sites have been changed substantially. Surely these plans cannot legally go through to completion because of this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/509   Respondent: 10741793 / Dianne Mathie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 45 houses at Clockharn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/508  Respondent: 10741793 / Dianne Mathie  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is definitely not required in terms of housing need either for the village or the borough. So what are the justifications?

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available. Please explain.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding. Please do not destroy 16th century trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/507  Respondent: 10741793 / Dianne Mathie  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. Send is already gridlocked at key times during the day and simply cannot cope with any more traffic at all.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. I moved to Send because I have asthma sufferers in my family and extra pillion would seriously detriment their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/506  Respondent: 10741793 / Dianne Mathie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I absolutely object to the development of 40 houses at Send Hill due to it's high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site. You must take note and be aware of the unsafe landfill waste and also the single track country lane issue and respond to these issues thoroughly.

I also strongly object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/510  Respondent: 10741793 / Dianne Mathie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. How can you justify the havoc this will cause?

Finally, I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which surely must be targeted first for development before the open countryside and the beautiful Green Belt and the failure to include the Town Centre Masterplan2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT

to the proposed plans to build 715 new homes, 385 flats,1,500 place secondary school,a primary school for 420 pupils, residential or care home, parade of shops,and the borough's allocation of 6 showman pitches, 8 flats by the station, and 8 flats in Glaziers lane.!

This planned development is preposterous!
I believe all these plans are developer led, without any respect for the villages and the current residence. Both Villages are in the Green Belt, and I OBJECT to this protection being removed.

The proposed development is disproportionate to the surrounding area.

We already have a problem with flooding, and I see no Plans to improve the water and sewage management, and more building on the green fields will only increase the risk of flooding into those houses and buildings.

I OBJECT

to having all this extra traffic on our road system, that cannot cope at the moment, when the Hogs Back becomes congested and the traffic uses Glaziers Lane as a Rat Run. I see no plans to improve the road system- how can they, there is no room in this area!

I OBJECT

to these plans encroaching on the habitat of wildlife. We have a number of Hedgehogs, Dormice, Great Crested Newts, Barn owls, Stage Beetles, Skylarks, Toads, Lizards, Grass Snakes, Adders, Slow worms Badger and Bats in the area, their homes need protecting too!

I OBJECT

to any further building of schools, as there is no proven need for such. I believe the secondary schools locally are under subscribed by 736! Another 480 places at the new Technical collage, and St Peters have plans to expand. I understand there has also been plans submitted for a secondary school at Rokers, in Worplesdon.

I OBJECT

to the disruption that the construction traffic will have, the continual noise and pollution this will generate. This will lead to significant health issues. No regard has been given to the well being of the current residence.

I OBJECT

to the Green Belt being eroded by large house building firms, rather than for the needs of the local community. There must be brownfield sites that can be used eg:- Woodbridge Meadows, Walnut Tree Close and North Street. It would be more sustainable to build homes in urban areas that already have infrastructure and services in place.

I OBJECT

to Normandy becoming 4 times larger, with a 70% increase in housing!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4797  Respondent: 10742433 / Carol Booth  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

More homes must be built on Brownfield sites first, and I feel that Surrey University should build the promised student accommodation at Manor Farm to house more students on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1563  **Respondent:** 10742753 / Debbie Leane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **object** to the building of 45 houses at Clockburn nursery. Such an action would be incredibly irresponsible of the local council. Traffic along Send Road is extremely high and consequently it is hazardous for cars trying to join it from Tannery Lane. The future additional housing at Tannery and the new marina development will only increase traffic on this road and therefore exacerbate the danger.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1564  **Respondent:** 10742753 / Debbie Leane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **object** to the proposed building of 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. If such industrial areas are necessary then this should be extension of the industrial space at Slyfield not in Send. Guildford council has also refused to disclose their calculations for the current demand for extra housing and I believe these 400 houses are not an essential requirement for this specific area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to a new interchange with the A3 at Burnt Common. Consequently it would be our village which would have to bear the brunt of increased traffic from the proposed 200 new houses at Wisley airfield, 2000 new houses at Gosden Hill, Burpham and 1850 at Blackwell Farm, as vehicles travel to and from the A3, M25, Woking and Guildford. As I stated before, Send Road is already incredibly busy, particularly during the rush hour. Increasing the volume of traffic along this road will only end in gridlock, and as a result the levels of noise and air pollution will get worse. Current levels are too high, and therefore such a development must not be allowed to go ahead.

I request that my comments are shown to the Planning inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the development of 40 houses and 2 travellers' pitches at Send Hill. This site is inappropriate due to the fact that access is only via a narrow single road. In addition to this, this site contains subsoil with documented unsafe landfill waste registered at GBC, and therefore is not a suitable location. This development will only spoil the current beautiful countryside we want to preserve in our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I am writing to notify you of my strong objection to the current local plan for Send village.</td>
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<td>In particular ...</td>
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<td>I <strong>object</strong> to Send village being removed from the Green Belt. Green Belt status is supposed to be permanent and there is simply no justification for ignoring such an important stipulation. In the last election both our local councillors and the government promised to preserve the Green Belt, and this goes against that promise. Preservation of this area is extremely important for ensuring that Woking and Guildford do not become one large conurbation.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to policy A42 change at Clockburn in Tannery Lane. How can the council justify a 33% increase to 60 homes from 40, <strong>again</strong> ignoring the objections of the local people and placing the entire burden on Send village? This will only further exacerbate the traffic problems and dangers we already face around Tannery lane and the junction of the A247. Also and even more importantly, such development of housing would spoil the outstanding views from the River Wey.</td>
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I object to Policy A43 change at Garlick’s Arch because this area of Green Belt is incredibly beautiful, consisting of ancient woodland that existed at the time of Elizabeth 1. The fundamental aim of green belt policy is to ‘prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of green belts is their openness’. This area separates our two villages and therefore should be protected. I feel the objections from Send and Ripley residents are just being ignored again!! Furthermore, there is no evidence that Travelling Showpeople plots are needed in this area. Such development will only increase traffic around our village that is currently, during various times of the day, incredibly busy already. It is fundamentally wrong for our village to have to carry the burden of such an excessive number of houses which would only lead to one large conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1596  Respondent: 10742753 / Debbie Leane  Agent:

Document: proposed submission local plan: strategy and sites 2017 / Policy A58

I object to Policy A58 at Burnt common as this was withdrawn from the 2014 plan as a result of huge local objection, so why has it suddenly reappeared? There is no local requirement for greater industrial development. In fact, recently there has been a decrease in demand for industrial space, with empty sites and units currently at Slyfield and Guildford. If you look at the 2017 Employment Land Need Assessment, it shows demand for industrial land has decreased. Such a huge allocation will only again add to the traffic problems that we currently have in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4177  Respondent: 10742945 / Trevor Brider  Agent:

Document: proposed submission local plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. The West Horsley Parish Council and Surrey Community Action Housing Survey May 2014 identified a limited need for only around 20 affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4176</th>
<th>Respondent: 10742945 / Trevor Brider</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. There are very few pavements in West Horsley and as such pedestrians safely would be an issue with more people in the village.

1. The Raleigh School is full and with the site unable to be expanded at its current location a new site would have to be secured. Where?

9. There are already long waiting times for appointments to see a doctor at many times this would just get longer. A knock on effect would be higher capacity at local hospitals with more people needing specialist treatment over time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4175</th>
<th>Respondent: 10742945 / Trevor Brider</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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6. The public transport in West Horsley would be incapable of taking more capacity. As the few roads through the village are two way and at points merge into one it would not be practical for more traffic e.g. buses and more school transport to flow freely at school times in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4170 | Respondent: 10742945 / Trevor Brider | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objections to the above.

1. As a resident of West Horsley I am opposed to the village’s removal from the Green Belt as the first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development”. I believe the plan to be inappropriate.

2. There are no exceptional circumstances or other justification for the new Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4174  Respondent: 10742945 / Trevor Brider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. As a resident of West Horsley I know what it is like to have my previous home flooded. I believe that no major works have been undertaken since the incident at my previous home to prevent this happening again. As such the drainage system of West Horsley isn’t capable of taking the water or waste from more homes. Thames Water don’t appear to have any plans in place in the near future to alleviate this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4173  Respondent: 10742945 / Trevor Brider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. The high number of proposed homes is too high to be sustained in local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/766  Respondent: 10742945 / Trevor Brider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I believe that the Green Belt & Countryside Study to be flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/325  Respondent: 10743105 / Nicola Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to inset Send business park from the green belt on the grounds that this site is adjacent to the beautiful Wey Navigation and flood plain meadows and is an historic left over which should be confined within its existing space in order to prevent further erosion of the nature and character of the area.

Overall I have serious concerns about the manner in which the clear and settled opinion of the villagers affected by the local plan have been ignored by the council both in the initial instance and in the revisions made. Local infrastructure is already unable to cope. No further significant housing or industrial development should be made until measures are taken to alleviate traffic overload through Send. Limited affordable housing should be placed on previously developed sites (e.g. old school site) before any green field sites are allowed. Local services like schools, which are at full capacity in Send, sewers, and medical services are already overburdened - the doctors and pharmacy has just had to increase the time taken for a repeat prescription to 5 working days. Guildford borough council has an obligation to take the Send neighbourhood plan into consideration in development decisions and needs to honour local opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: pslp172/2541</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Policy A42 in respect of the increase in the number of proposed housing at Clockbarn Nursery by a third. The development is on a narrow lane unsuitable for larger volumes of traffic and will worsen the busy and uncontrolled junction with the A247, particularly with the impact with the ill thought out plan to enlarge the junction on the A3 at Burnt Common with the inevitable and unacceptable increase in the volume of traffic using the village as a through route to and from Woking - it will be impossible to turn right out of Tannery Lane at busy times. Policy A42 also ignores the large volume of objections previously made to the development of this site and is an affront to local democracy which is supposed to seriously consider local opinion, not dismiss it out of hand and worsen the situation.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to Policy A58, particularly the unlimited nature of the plan where the 7,000 sq m are now described as 'minimum', thus leaving the way open for future expansion over which the local community would have no control. There is no need to develop this space when there is plenty of spare capacity and space for expansion at the existing industrial site in the borough at Slyfield.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- There is no proven evidence to show that we actually need the number of houses, industrial sites and further retail development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/132  **Respondent:** 10746209 / Pauline Fava  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The land at Garlick's Arch recently added to the plan is of ancient woodland. Surely of great value from a conservation and aesthetic aspect and like the green belt once built on is lost forever. These are are valuable assets helping to fight poor air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/133  **Respondent:** 10746209 / Pauline Fava  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The proposed slip road on to the A3 will add to congestion on local roads. Some of which are barely wide enough for two cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/134</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>- I strongly object to the land west of Winds Ridge and Send hill designated for 40 homes and 2 travellers pitches being built on. Again this is green belt with very poor access. Send Hill with a dangerous junction on to Potters Lane is single track.</td>
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<tr>
<td>I am deeply saddened by GBC's outrageous way of treating its residents. Whilst I agree some low cost housing is needed you have failed yet again to take any notice of the views and wishes of Send and object to the plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I strongly object to many aspects of the local plan proposed for our village.</td>
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<tr>
<td>- Send should not be removed from the green belt. We are a village and have no wish to joined to other settlements by the large number of homes and industrial sites proposed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
- Our roads are running at capacity now and we suffer long traffic jams on Send Road. Further spending as proposed on the A247 is not going to alleviate the problem when cars from the planned housing are using the route.
- The Villages Medical Centre is running to capacity and could not cope with additional patients from proposed housing.
- Our village schools have no means of taking in more pupils.
- infrastructure has not been thought through and the necessary funding is not in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/1865</th>
<th>Respondent: 10746209 / Pauline Fava</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because the impact on the small surrounding roads will add to already overstretched roads in the area. There have been no appreciable improvements to the local infrastructure in the last forty years. Roads are grid locked every time there is a problem at the M25 Junction 10. In one recent week that was on three days. This is damaging businesses locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/5432</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Road is at maximum capacity every rush hour. The road through West Clandon cannot take two lorries passing each other without one having to mount the pavement. The narrowest part of The Street is close to a junior school. There is no chance of widening these roads without having to purchase local private property.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not a huge over allocation of 10 hectares in the Green Belt in Send.
It is quite clear that the whole basis of your plan for the Send area is politically motivated as neither of our councillors are Conservatives. This is totally unacceptable and has been noted by the electorate locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1023  Respondent: 10746369 / Y. Quittenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1735  Respondent: 10746369 / Y. Quittenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:
• Destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/291  Respondent: 10747297 / Pauline Willgoose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Jacobs Well

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a long term resident of Jacobs Well I object to Jacobs Well being considered taken out of the Green Belt, this village although changed in the 45 years I have been there is still in the countryside, it is surrounded by fields, open countryside and a place where one can breath. The boundary of Woking is very close to where I live and I do not want to join up with the town which in turn is joined up to the urban sprawl of London. This is a village let us keep it so The proposed link road to Slyfield, over the deepest part of the flood plain is positively a crazy scheme, the traffic which is already heavy will have a knock on effect on congestion through the village, although I have already objected to this I am again objecting. Please consider local residents and their safety and enjoyment of village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3492  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of 2000+ houses etc – I object to the proposed plan and set out below some of the reasons.

I wish to object to the above proposal on the following grounds:-

1. Green Belt has a presumption against development unless there are very special I fail to see any such circumstances in this application.
2. The local roads are unsuitable for an extra 3000+ cars from this Even allowing for a new access point onto the A3 I Ockham Road North roundabout the flow would be to a congested A3 and narrow surrounding roads. Cut though roads such as Wisley Lane and Newark Lane are single width at various points while the High Street cross roads with Newark Lane and Rose Lane in Ripley is a frequent congestion point. Tinkering with these junctions only pushes the problem further up these narrow roads. To access the A3 southbound, traffic would have to travel through Ripley to the Burnt Common roundabout. Send Road, Send (A247) is also likely to be adversely impacted on an already congested road right through to Old Woking at peak times particularly as there are schools along this route. The Cobham slip road off the A3 northbound is already frequently backed to a standstill onto the A3 itself. See also numerous comments from the A3 Survey in www.getsurrey.co.uk
3. If you link this proposed development to the following potential huge unwarranted developments outlined in the draft Local Plan (some noted below) then on road infrastructure alone it is simply ludicrous:-

1. Site Allocation A 15 Guildford Cathedral - 1 00 homes I 150+ cars
2. Site Allocation A24 Slyfield - 1000 homes / 1500+ cars
4. Site Allocation A26 Blackwell Farm - 1800 homes / 2700+
5. Site Allocation A42 Tannery Lane, Send - 45 homes / 60+ Site
6. Allocation A43 Garlic Arch - 400 homes / 600+ cars
7. Site Allocations A38, A39, A40, A41, A45 - 463 homes / 700+ cars
8. Site Allocation A44 Send Hill, Send - 40 Homes / 60+ cars.

4. By continuing to "over react" to what we are led to believe is a greater need for housing in the south east we are destroying the essence of village life that has "evolved" over hundreds of Small developments of say 4 or 5 houses may be acceptable in some rural areas along with updating and modernising existing stock which would not impact the character of the area. Population and business growth should be dispersed in other areas of the country where there is a need and to even up the "divides" rather than concentrating on a self defeating build more / attract more process in the south east.

5. This Green Belt proposal if allowed could lead to other substantial developments in the vicinity (some mentioned in 3 above) which have already been condemned by local residents during the draft plan consultations and thus should be refused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3494  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed developments on scale and infrastructure basis.

National Planning Policy Framework 2012 Sect 4 paras 34,35,36,37. Send is already congested during rush hours and school times with long queues forming along the A247 on a regular basis. Any junction improvements with Tannery Lane will exacerbate the situation as increased traffic will back up along the A247 in busy periods. Yellow lines along the route would cause difficulties for access to the shops and schools and force parking into residential roads. Tannery Lane is single track for most of its length and is wholly unsuitable for any increased traffic flow from the proposed new developments. It would also be dangerous for walkers and cyclists. Not only would this adversely impact Send village but also at the other end into Ripley via Papercourt Lane or Polesden Lane (both single width) onto Newark Lane. Access into Ripley onto the B2215 at this point is single width and any increased traffic flow would be unacceptable by any reasonable standard. The A3 at Ripley is often queued northbound due to frequent congestion at M25 Wisley J10 towards Heathrow.

Transport links are poor. Buses to Woking and Guildford are approximately every hour and hardly convenient in rush hour. Getting to Clandon station is more difficult and time inefficient. Whether Send Villages Medical Centre could cope with additional population is questionable as it is often difficult to get a prompt appointment now e.g. 10 days recently.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/3496  **Respondent:** 10749409 / B. Holmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Garlic Arch Development - 400 Houses etc

I object to the proposed plan and set out below some of the reasons. This is Green Belt and should remain so.

As set out in the National Planning Policy Framework 2012, Sect 9.80, Green Belt serves several purposes including:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from

There are no very special circumstances to allow such a development to take place on this site.

I fully endorse the Send Parish Council's response to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3477  **Respondent:** 10749409 / B. Holmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traveller Sites and 40 Houses -1 object in the strongest terms to the proposed plan and set out below some of the reasons.

Send Hill is totally unsuitable for any increased traffic volume that would result from future housing developments and traveller sites as the road narrows to single width from Orchard Way down to Potters Lane and there is no pavement along the majority of the road. There are many walkers and cyclists who use this route. As I see it there is no government pressure to inset this site and no compelling reason for Guildford Borough Council to make this proposal at all. There are no special or exceptional circumstances for such a proposal.

Housing affordable or otherwise is in appropriate on this rural Green Belt site as it will:

- Result in loss of established open view landscape.
- Result in increased traffic flow.

---
- Create a safety hazard for cyclists, pedestrians (Children, Walkers, Dog Walkers and Joggers).
- Disturb hazardous material underground etc.
- Require Infrastructure improvements.
- Disturb the peace & tranquillity of the area.
- Adversely affect the character and quality of life.
- Increase noise pollution.
- Disturb the natural habitat/wildlife.

Send Hill is a peaceful residential road with open views comprising a mixture of bungalows and houses with a fair proportion of elderly and vulnerable inhabitants and a junior school at the bottom of the road. The idea of a Travellersite and or housing in this location will detrimentally alter the character of the area and is highly inappropriate. Any such developments would be removing existing open space and greenbelt, not protecting it.

The road is very narrow i.e. single track at the point of the proposed site i.e. two cars are unable to pass, and it would be unsuitable for access to the site. Turning left from such a site into the narrow road is blind and would be a danger to pedestrians, cyclists and other motor vehicles. The opening up of access to this site would have further undesirable consequences on the open land further along the road.

Parking for the junior school in Send Hill is a considerable hazard with only enough space for one vehicle to pass during pick-up times and the additional traffic resulting from any developments will simply amplify the dangers.

Development of this site and other allocations in Send will undoubtedly result in serious infrastructure deficiencies which would destroy the Village. Any disturbance to the ground for foundations or utility services would require a geo technical survey and remediation work to be carried out. I doubt drainage, sewerage and water supply pressure capability for any new development.

The proposed site is an old landfill land believed to contain hazardous materials, including rumoured asbestos, cadmium and mercury. Any disturbance of the ground for building or services is therefore a potential health hazard. My understanding is that a geo survey would have to be undertaken along with likely remediation work before any disturbance could even be considered.

Public transport is very limited. It is approximately half a mile walk to the nearest Bus Stop and the services to Woking and Guildford are not very frequent. The nearest Stations are Woking and Clandon both of which are difficult to get to without a car. The main roads to both are narrow and busy, particularly so at rush hour and unsuitable for safe cycling. It is highly unlikely that this could be changed.

This proposed site is not surrounded by existing housing and would clearly impinge on the openness of this piece of Green Belt. Indeed the site is open on three sides with existing housing on one side only with a public foot path inbetween. Therefore any developments here would totally inappropriate.

Any development on this site would destroy the character and open landscape of the area. Coupled with other site allocation proposals in Send, and adjoining lovelace and Woking, will clearly over burden the infrastructure to an unsustainable level.

This is a Green Belt Outside Settlement Boundary site and any development would result in the loss of the visual landscape from overlooking houses such as ours, ramblers, dog walkers and pedestrians. Other reasons are stated elsewhere in this document

This open space is used by many dogwalkers, local ramblers and families and is a safe haven for the purpose and provides opportunity for social interaction. There is also a variety of wildlife on or visiting the site including Rabbits, Foxes,
Squirrels, Snakes, a variety of Birds, Bats and occasional Deer. Loss of this space to either Housing or Traveller sites will deprive the community of this sanctuary.

- The current Greenbelt site contributes to the environmental ambience of the area and encourages people of all ages into activity (walking etc) and enjoyment of nature. There is a social element as well in that walkers will often meet in a countryside setting and have a chat.

- There is a basic conflict between the numerous site allocation proposals in Send, Lovelace, and (Old Woking) as village locations and the need and ability to provide infrastructure improvements. Take into account the ludicrous proposals for Wisley and Gosden Farm as well and you have a recipe for urban sprawl and gridlock. A large proportion of rural village residents have to rely on the car for commuting and essentials hopping trips as bus/train services are infrequent and are too far away. Mass development on this scale in a rural greenbelt village is a recipe for disaster, wholly inappropriate and should be resisted.

- Send Hill is narrow and does not allow two cars to pass in several places including outside our house directly opposite the proposed site. There are no pavements along most of the road meaning people including children, OAP’s, dogwalkers and ramblers walk in the road. In addition there are six footpaths emerging onto Send Hill. Any new development that increases the car population will have an adverse safety implication. If this and the other site allocations in Send, Old Woking and Lovelace are allowed, significant increase in traffic flows and queues will occur along Broadmead, Send Road and Send Barns lane (A247). As a consequence of this, motorists will seek to use alternative routes including Potterslane and Send Hill which are entirely unsuitable for the purpose. In addition to the safety implications to the local residents, cyclists and Horse Riders who use Send Hill there is considerable danger for the children at the School end of the road at drop off and pick up times.

- Send Hill is mentioned in the Surrey Cycle Guide No 2. Walkers (children, OAP’s, dog walkers, joggers and ramblers) use the road as there are no pavements in most of the length of Send Hill. Any new development that increases the traffic flow will have safety and environmental implications.

- No amount of architectural creativeness or spin could create an attractive new view with the proposed developments.

- The narrowness of most of Send Hill is clearly evident and developments such as this can only cause visual deterioration and increased safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7706  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Village Insetting - I object in the strongest terms the proposed removal of significant parts of Send Village from Green Belt status.

As set out in the National Planning Policy Framework 2012, Sect 9.80,

Green Belt serves several purposes including:
• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from

To inset in the overbearing manner which is proposed for Send village, particularly in the Send Hill (A44)/Bush Lane area, would open the door to inappropriate developments in the future and contravene the NPPF as above and indeed the Department for Communities and Local Government Policy E16: Traveller sites in Green Belt:

• Inappropriate development is harmful to the Green Belt and should not be approved, except in very special Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7682  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Traveller site allocation is inappropriate and in conflict with the Department for Communities and Local Government Policy E16: Traveller sites in Green Belt:

Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

We are overpopulated in this part of the country. In satiable demands for new housing conflicts directly with our inadequate infrastructure. One solution would be to reverse the trend by encouraging businesses to relocate to under populated parts of the country or regeneration areas. If we don't then our quality of life and crime rates will surely degenerate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2950  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A42 Clockbarn Nursery, Tannery lane, Send
Allocation - 60 Homes (increased from 45).

I object to this policy and comment on the amendments only in this instance as requested (my previous comments from the 2016 consultation still apply).

There were many objections to the original proposal and the proposed increase in homes appears to ignore those and just magnifies the problem.

More erosion of the Send Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2951  Respondent: 10749409 / B. Holmes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Land at Garlick's Arch, Send, Allocation - 400 Homes and 6 Travelling Showpeople Plots
I object to this policy and comment on the amendments only in this instance as requested (my previous comments from the 2016 consultation still apply).
I fail to see what exceptional circumstances exist to provide travelling showpeople such plots on Green Belt land and, coupled with the proposed homes allocation, create an urban sprawl in contravention of NPPF section 9.80.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2949  Respondent: 10749409 / B. Holmes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Traveller Pitches and 40 Houses - I object to this policy and comment on the amendment only in this instance as requested (my previous comments from the 2016 consultation still apply).

Re Requirements item 10) Improved visibility to be provided at the junction of Send Hill with Potters Lane:-
While any improvement to the visibility at this junction would be welcome as a basic safety issue (it's a blind bend turning right out of Send Hill), the fact remains that Send Hill is single track for the most part including past the proposed site and this house and is fundamentally unsuitable for increased traffic flow (see photographs attached). It becomes single track within approximately 25 metres of this junction along Send Hill (although centre white lines are marked for about 50 metres).

Air Ambulance on the Policy A44 site for a Medical emergency in Send Hill on 22nd February 2014.

Policy A44 Land West
Traveller Pitches and 40 Houses - I object to this policy and comment on the amendments only in this particular instance as requested (my previous comments from the 2016 consultation still apply).

Re Key Considerations item 1) Contamination:
The potentially hazardous materials buried at this site make it unsuitable for traveller pitches or housing development. Along with my previous comments in July 2016 this site should remain Green Belt and be entirely removed from the proposed local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID:  
Document:  

Policy P2 Green Belt -
I object to the proposed removal from Green Belt (insetting) of Send Business Park. While some modernisation may be acceptable to improve the vista, any expansion of this site is inappropriate due to the single track nature of Tannery Lane which is already under threat from Policy A42 Clockbarn Nursery. While I comment on this amendment as requested, it does form part of a much bigger picture for Send in that para 4.3.13 includes Ripley, Send, Send Marsh and Burnt Common as inset in contravention of NPPF sect 9.80 and ignoring multiple previous consultation responses. My previous comments from the 2016 consultation still apply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPS16/1673 | Respondent: | 10750337 / Veronica Kean | Agent: |
|-------------|--------------|-------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |

I object to the construction of 400 houses and industrial space at Garlick’s Arch opposite Send Marsh Road. This site floods and is covered by ancient woodland. If the site does not act as a natural flood plain the flood water will cause flooding in other residential areas. More houses will also mean more traffic congestion, more pressure on the Villages medical centre and more pressure on school places.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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| Comment ID: | PSLPP16/3656 | Respondent: | 10750337 / Veronica Kean | Agent: |
|-------------|--------------|-------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |

I object to a new interchange at Burnt Common because Send would have to take even more traffic from the proposed houses at Wisley Airfield. Send Road is already overloaded and would become grid locked.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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| Comment ID: | PSLPS16/1673 | Respondent: | 10750337 / Veronica Kean | Agent: |
|-------------|--------------|-------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |

I object to Send Village being removed from the Green Belt as it provides a buffer that stops Woking and Guildford merging into one over-populated urban conurbation. Local councillors and central government should not renege on their election promises to protect the Green belt from being destroyed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing to say that I object to the latest version of the local plan – in particular proposal A46.

I was shocked to hear about the size of the proposed development, given the proposed location – on a sensitive area of the green belt in the heart of a small rural community. There are many reasons why this is just wrong:

1. To double the size of an existing community in one move will have a major impact on people’s lives and destroy the nature of our community
2. Although I accept that new homes are needed this must be balanced with the needs of existing residents and the quality of our environment – surely GBC understands this?
3. If our village is destroyed in this way and our sense of community disappears, I fear many impacts including an increasing crime rate – which at present is extremely low
4. Existing residents may well move elsewhere, changing the nature of this area completely and making it less attractive to the very people GBC is building homes for
5. The development will have a devastating impact on local wildlife – including endangered species – and increase the risk of flooding – which is already a problem in some parts of Normandy
6. There is no way that existing roads (already very congested) can cope with such a dramatic increase in traffic – and the scope to improve them is extremely limited – given that most of them are country lanes and with the restrictions of railway bridges
7. This is a dishonest proposal – going against everything that our local councillors stood for during the elections last year when they pledged to protect the green belt
8. Why are GBC proposing such a large development (in such an inappropriate area) and not distributing development more evenly across the borough which would have far less impact on any one community?
9. The proposed school is simply not needed, existing schools are undersubscribed and have room for expansion. There are few children in this village in need of a school – this seems like an excuse to allow the development company to run roughshod over our beautiful green belt. Profit before people and the environment? Shame on you.

This proposal – A46 – is clearly not properly thought out or planned – and should be dropped from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am delighted to see that both of the proposals for building multiple new homes on green belt land in Normandy have now been removed from the plan. I fully support this, as our local infrastructure was never going to cope with this level of expansion in the area.

I am concerned about the proposal to remove some homes in Normandy from the green belt as this means that there will be fewer restrictions in the future and I believe that this could have a longer term detrimental impact on the openness of the area.

Finally, given the number of new homes in the Guildford area I strongly feel that GBC must prioritise road improvements, as roads are already busy, with particular pinch points in Normandy at the junction of Frog Grove Lane and the A323, and the level crossing at Ash which causes major delays at times. I trust the council will include this in ongoing planning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10750593 / Jo Williams</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I am writing to you to object to the changes to the Local Plan, especially the council's proposals to develop the land at Garlick's Arch at Burnt Common on the Send/Ripley borders for housing and industrial warehousing, however there are many aspects to the revised Local Plan that I find incredulous.

I am completely bewildered and angered by these proposals, the beauty of these villages and surrounding areas will be absolutely destroyed by the plans proposed. To suggest Ripley, Send and Clandon should be removed from the Green Belt is a disgrace. The infrastructure and services simply cannot support the levels of housing and warehousing proposed and the council 'dangling a carrot' in the Local Plan about creating new A3 slips at Burnt Common is nothing short of bribery.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
In short:

- I object to the erosion of the Green Belt, 16th century trees, beautiful countryside and natural habitats for animals will be destroyed
- I object to Ripley, Send and Clandon being removed from the Green Belt, this would devalue the homes of existing residents and cause destruction of our rural villages
- I object to the disproportionate amount of development being proposed, these are villages with defined boundaries, not towns
- I object to the last minute inclusion of these proposals in the Local Plan with less than 2 weeks’ notice and suggest the approach taken was unethical
- I object to the fact that no housing needs analysis has been produced and made available publicly, even affordable housing in these villages would be out of reach for the majority
- I object to the fact that no industrial warehousing needs analysis has been produced and made available publicly
- I object on the basis the infrastructure cannot accommodate the proposed development, there is no immediate provision for new schools, doctors surgeries etc. and the Royal Surrey Hospital is under significant strain
- I object on the basis that no other alternatives for traffic calming/routing have been produced and/or made publically available (I suggest options above)

Do not destroy our beautiful villages and rural surroundings, I appeal to your moral compass!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/146  Respondent: 10750593 / Jo Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is clear to see that the traffic congestion through Ripley and Send is not caused by residents, it is caused by those using the villages, Ripley and Send in particular, as a cut through to Cobham/Byfleet/Weybridge and surrounding areas because of the congestion at the A3 Cobham junction, especially in the mornings. A recommendation would be to consider what improvements could be made here and introduce different traffic calming/deterrents in the villages instead. For one, on the mornings when the traffic lights are not working around the Cobham junction on the A3, slip the cars flow more freely. Creating one way traffic flows in Ripley, especially at Newark Lane, would also make a significant difference to traffic flow - the one way being exit from Newark Lane into Ripley village and remove the option for vehicles to turn from the village into Newark Lane - this is the rat run through to Cobham/Byfleet etc...it would be easy to put a small roundabout in place here to keep traffic moving more readily. Another suggestion, prohibit lorries from delivering to stores in the village between key commuting times as they prevent the easy flow of traffic - it's not rocket science, there are plenty of other options and I haven't seen any evidence of alternatives being considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/180  Respondent: 10750593 / Jo Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Once again I am compelled to write to you to raise objections regarding the local plan. I find it exasperating that I continuously have to raise objections to a local plan which demonstrates an absolute failure of a proper planning process. You have not made any attempt to mitigate and or amend the plan despite the significant volume of objections to the 2016 plan. Indeed Guildford Borough Council has made the situation even worse by combining proposals around Garlick’s Arch and Burnt common and not altering the proposals based on previous objections.

I object to the proposals to build 400 homes and 6 travelling show people plots on the land at Garlick’s Arch, Send Marsh, Policy A43, for the following reasons:

• Thousands of objections have been raised on this previously, this is in complete disregard to all previous objections
• There is no evidence of a demand to house travelling show people in this location, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]
• The land is in the Green Belt and no exceptional circumstances exist
• The number of homes is excessive ensuring complete over development of the village. There would be no definition of villages between Ripley & Send defeating the purpose of the Green Belt
• Infrastructure cannot support this. Traffic and pollution levels are already a major problem, schools and medical facilities, as required by law, are already over stretched
• The land is an ancient woodland that existed back in the reign of Elizabeth 1
• The area is subject to frequent flooding and is currently a flood zone 2 allocation, drainage remains substandard
• Due to local shooting facilities, the land is contaminated by lead shot

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/181  Respondent: 10750593 / Jo Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to provide an allocation for a minimum of 7,000 sq m of industrial or warehousing on the land at Burnt Common, London Road, Policy A58, for the following reasons:

• This was deleted from the 2014 draft based on previous objections, why should it be resurfaced when there is no need to build industrial or warehouse space in the middle of the Green Belt? Guildford and Slyfield have empty sites and industrial units already, the requirement for more space does not exist
• Since the 2016 plan there has been a decline in demand for industrial land (as proven in the point above re: empty units)
• The 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares in Send in the Green Belt
• Infrastructure cannot support this. Traffic and pollution levels are already a major problem
• By joining up the villages there would be no definition between Ripley & Send defeating the purpose of the Green Belt

Yet again, having to write to raise objections to an ill-considered plan that has not been amended, despite the volume of previous objections, really demonstrates a lack of competence in this space. It is infuriating to local residents who yet again have to ‘go into battle’ with a local council that clearly is not listening to the community, it’s a complete disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Having recently had an extension to our property and experiencing nearly 2 years of rejections from the planning department for an extension which several of my neighbours had already had similar work. The planning department repeatedly stated the importance of send maintaining is quaint appearance and keeping development in the area controlled. I therefore find it personally insulting to see this plan being proposed for this 'quaint area' from the department that made us reduce a dormer window by 10cm (a 5% adjustment!) are now planning to tear up the rule book they so stringently stuck to when looking at our planning application. This screams of massive double standards. We paid for many architects drawings to appease the local planning department who now seem happy to add 100's of new houses to the area. I would urge you to look at their rejections to our planning application and apply these to the local plan.

I wish to register my objection to the local plan for the Send area for the following reasons highlighted by the save send action group, I wholeheartedly agree with all points raised:

• I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.
• I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
• I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
• I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
• I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
• I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.
• I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.
• I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
• I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh and the impact on traffic congestion and local services would be unacceptable.
• I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
• I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
• I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.
• I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.
• I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.
• I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predate the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.
• GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.
• I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 5th January 2005-Identifies proposed site as potentially contaminative industrial land. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.
• I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.
• I object to the proposal in the local plan on the grounds that both the Envirosfootprint RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill sites raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.
• I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potentially risk from landfill gas migrations” which I believe is a health hazard.
• I object to the proposal in the local plan on the grounds that both Envirosfootprint RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.
• I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.
• I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed.
• I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.
• I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3256  Respondent: 10750945 / Lorna Crispin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A42 building 45 houses at Clockbarn Nursery.

Tannery lane is a narrow country lane and not suitable to take any more traffic. The junction with Send road will become significantly more hazardous it will also create rat runs around the network of country lanes around Papercourt and Ripley will become more of a cut through and dangerous. Development of this area would destroy Green Space habitat and destroy the buffer between Send Village and the Tannery Lane business area.

This site must not be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3257  Respondent: 10750945 / Lorna Crispin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43( building 400 houses and 7000 sq metres of industrial space at Garlick's Arch). The site is covered by ancient woodland which must be protected and not destroyed for development purposes. The industrial space is not needed in this area. The housing proposal is excessive and brown field sites must be used as a first priority.

This proposal would create traffic congestion, pollution and an industrial area will generate unacceptable levels of heavy traffic through Send Village this would irrevocably damage the area and environment. Send must not become a Local Rural Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/3258</th>
<th>Respondent: 10750945 / Lorna Crispin</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A43a (New A3 entry slip-road towards Kingston/London, and new A3 exit slip-road from Kingston/London) This would create congestion and heavy traffic through Send Village at peak times, as it is an accident or breakdown on the main arteries causes congestion all around the area of Send and Ripley. This proposed Policy would add extra pressure to the road network, create unacceptable levels of noise, pollution, put residents and children (all now accessing Send School off the main road ) at greater risk this and this is unacceptable.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A44 (40 houses and 2 travellers' pitches at Send Hill). There is inadequate access to this area along the narrow country lanes. The subsoil of the proposed development contains unsafe landfill waste registered at GBC. Any development would destroy the high amenity value of the immediate area which is Green Belt. This site must not be developed</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
### Comment ID: PSLPP16/7168  Respondent: 10750945 / Lorna Crispin  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy P2 where Send Village would be removed from the Green Belt. The Green Belt is intended to be a permanent area of protection against development, it provides protection for the wildlife and countryside and provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local government gave an election promise to protect the Green Belt and this reneges on it. Once the land is given over to development it will have a negative impact on the area through traffic congestion, pollution and will irrevocably damage the environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: SQLP16/1094  Respondent: 10750945 / Lorna Crispin  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham, which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.
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I OBJECT to GBC not having followed correct process in relation to the above Policies being objected to (P2, A42, A43, A43a, A44) The significant changes to GBC Local Plan in relation to Send from 2014 until now July 2016 mean that a full consultation must be undertaken under regulation 18, and not the short-cut Regulation 19 process currently being attempted by GBC

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3514</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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Objection to planning in Keens Lane

I live in Findlay Drive and object to the proposed development

1 No infrastructure regarding roads already a cut through from the Aldershot road and the A322 seeing an increase in traffic flow
2 Green belt no more encroachment joining Guildford to Worplesdon
3 impact on our wildlife at the end of keens Lane
4 Already two developments in this area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have not followed correct process. Concerning Send there is a change in the details concerning the 2014 proposed Reg. 18 the short cut to regulation 19 invalidates the whole process.

I object to policy P2. Send should not be removed from the Green Belt. Send is a buffer between Woking and Guildford. All the plans if put into practice will cause even more traffic on A247, increase in heavy goods traffic. The particularly vulnerable areas of land being taken out of the green belt include the land behind the school including playing fields and woodland.

The land to the right of Cartbridge by the river Wey navigation up to the new boundary fence with vision engineering.

Land to the left of Cartbridge going up to the old depot on the Wey navigation.

I object to Policy A44 1.9 ha land west of windridge and send hill.

Designated for A40 homes and 2 travellers pitches. This site is new and was not included in the regulation 18 draft has not been consulted upon previously.

Permanent Green Belt status. Housing development inappropriate due to its Green Belt status. Development would spoil an area of beautiful countryside.

The subsoil of the area contains documented unsafe land fill waste.

2 travellers pitches would be inappropriate due to narrow width single track road – causing insufficient access to site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would ask the review participants and inspector to:
1) Challenge the forecast population growth and housing numbers on which the plan is based namely:
a. 13,860 new homes; an average 693/year for the next 20 years.
This inevitably leads to extensive building on green belt;
something, as I understand it, the NPPF seeks to restrict.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6278  
Respondent: 10756033 / John Herbert  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object specifically to the proposed building on Gosden Hill on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of the village it blights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6279  
Respondent: 10756033 / John Herbert  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to some other sites in the local plan namely Garlick's Arch and West Horsley. These sites are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13090  Respondent: 10756033 / John Herbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to Green Belt boundaries, This is not justified by any very special circumstances. 3) Finally, test and challenge the proposed scale of development (hopefully largely reduced through 1) and 2) above) on the smaller communities scattered throughout the borough. Each area has to take some of the strain however large service facilities planted within smaller communities that have no need for the scale of service provided naturally leads to unnecessary traffic, congestion and public aggravation that can be avoided by placing the facilities more centrally to where they are required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13092  Respondent: 10756033 / John Herbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the infrastructure has not been properly assessed and, in my opinion, is inadequate to deal with the proposed housing levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13093  Respondent: 10756033 / John Herbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I object that housing on the Green Belt will increase traffic bringing increased
danger and pollution and slower journey times to our existing overcrowded
roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13078   Respondent: 10756033 / John Herbert   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I accept that to prosper all communities must continue to improve their
circumstances and to grow at a rate that all aspects of the community, and in
particular its quality of life, can develop in a balanced way. However, the rate of
growth proposed far exceeds previous experience, and that of the 2014 draft
plan, and from this forecast of demand all the other supply-side problems, that
are so exercising the community, arise.
I would ask the review participants and inspector to:
1) Challenge the forecast population growth and housing numbers on which
the plan is based namely:
a. 13,860 new homes; an average 693/year for the next 20 years.
This inevitably leads to extensive building on green belt;
something, as I understand it, the NPPF seeks to restrict.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13086   Respondent: 10756033 / John Herbert   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that the housing need has not been substantiated. The model has not been scrutinized and some fundamental assumptions appear flawed.

Thoroughly test whether all brown field sites have been utilized to their full potential. Ask the question; Is the community going to see brown fields developed before precious, and non-returnable green belt is destroyed? The suspicion is that there is a bias towards building on green belt as it provides better financial returns public savings and/or commercial profit) with any hidden costs borne by future generations.

There is also a view that the plan does not take proper account of existing green belt constraints. The fair minded expect the planners to prove, and the Inspector to test, that these are not the case as a successful long term plan does not turn on either price or speed; but what is best for the future community; which the authors of the plan, at least, are meant to serve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1544  Respondent: 10756033 / John Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to add my voice to the increasing number of those people who, like myself, are raising concerns regarding the thinking and direction outlined in the recent publication.

I object to this plan, as it is clear that it is not materially different to the 20L4 draft plan to which over 20,000 responders objected, including myself. It is clear that the consultation process has not been followed in any meaningful way as residents previous concerns have not been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1545  Respondent: 10756033 / John Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that new sites have been proposed in this consultation that have not been previously considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp1711009  Respondent: 10756033 / John Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the main, the revised plan continues to erode the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific objections to the 2017 Plan are:

1. I object to Policy S2 for the provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. The figure is too high as shown by the independent report commissioned for the GRA.

2. I object to the population growth figures in section 2.3, which have actually increased by 5000 over the previous plan. Downward economic pressures have not been taken into account in this new assessment.

3. I object to the fact that Policy S2 appears to include demand from London and nearby Woking in its assessment – Guildford should not become a dormitory town for either area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA161656  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1655  **Respondent:** 10756449 / Richard and Valerie Overton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3175  **Respondent:** 10756449 / Richard and Valerie Overton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. No consultation took place on this, and GBC’s Green Belt & Countryside Report does not even cover Garlick’s Arch.
The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3178  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3176  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6938  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6934  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses will lead to even more dangerous conditions and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6942  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6943  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6941  Respondent: 10756449 / Richard and Valerie Overton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/6932  Respondent: 10756449 / Richard and Valerie Overton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to the non-protecting of the Green Belt (Policy P2)

We object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/6936  Respondent: 10756449 / Richard and Valerie Overton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/6931  Respondent: 10756449 / Richard and Valerie Overton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/6937    Respondent:  10756449 / Richard and Valerie Overton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire):  ()

We object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/1515    Respondent:  10756545 / Cornelius Griffin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

7/ I object to the lack of infrastructure development in the borough generally to support the proposed housing / commercial development.

8/ I object to the lack of provision for additional school capacity.

9/ I object to the proposed increase in household with no provision for General Health services.

10/ I object to the lack of specific policy to ease an existing rural public transport crisis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1514  Respondent: 10756545 / Cornelius Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6/ I object to the lack of clarity / support for the housing numbers included in the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2791  Respondent: 10756545 / Cornelius Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5/ I object to the proposed A3 on/off slip at Burnt common, as a means of advancing large developments. This and the above site indicate a rather disingenuous responses at a public meeting with councillors held in Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2793  Respondent: 10756545 / Cornelius Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11/ I object to a specific policy re traveller pitches at the Paddocks, Rose Lane. The existing temporary permission has been ignored and the site is now over occupied, has brick structures and is an are for burning domestic and construction waste. This apparently cannot be monitored or enforced at the moment, so a legal extension would be unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6160  Respondent: 10756545 / Cornelius Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2/ I object to the degrading of the Greenbelt to a point when it’s very function is nullified.

3/ I object to the insetting/ removing of villages from the Greenbelt. This seems to suggest that buildings and communities are not part of a Rural England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6159  Respondent: 10756545 / Cornelius Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the concentration of development in the North of the Borough, aimed at appeasing developers, maximising their profits and benefitting an overspill population from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/991  Respondent: 10756545 / Cornelius Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites, with no opportunity for discussion. The Garlich’s Arch site proposal is totally disproportionate, even in relation to the site it replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2476  Respondent: 10756641 / Jo Murray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 Garlick's Arch

I object to the change of Policy A43 because it completely ignores the thousands of objections made by local residents to the previous draft local plan!

I object to the change of Policy A43 because the Green Belt was put in place to keep our villages, Ripley & Send, separate - this Policy defeats that purpose and there is no local need to build on this gorgeous Green Belt land of ours - and no exceptional circumstances apply.
I object to the change of Policy A43 because the number of homes is excessive and will cause over-development of the local area.

I object to the change of Policy A43 because the local infrastructure is already stretched to the limits, particularly local roads at rush hour.

I object to the change of Policy A43 because there are numerous environmental reasons why it is inappropriate, including: the area is ancient woodland, it floods frequently

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of immediate provision for new schools</td>
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<tr>
<td>I object to the lack of any immediate provision for Doctors' surgeries</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of any evidence for the alleged housing need numbers</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of a balanced and sustainable strategy combining development and conservation and providing affordable housing for local people</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
Comment ID: PSLPP16/594  Respondent: 10756961 / Carol Marsh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that this plan if implemented would leave sites of outstanding natural beauty as islands of conservation surrounded by developed areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/592  Respondent: 10756961 / Carol Marsh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any and all erosion of the green belt

I object to any removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/595  Respondent: 10756961 / Carol Marsh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that this plan if implemented would merge all villages along the A3 from the M25 to The hog’s Back

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/593  Respondent: 10756961 / Carol Marsh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/236  Respondent: 10756961 / Carol Marsh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period

I object to the last minute inclusion of new sites with less than two weeks notice

I object to the inclusion of 2000 homes on the Wisley airfield site when the to develop this has been rejected by GBC as unsuitable AND nothing has been done in this new proposal to address the reasons for rejecting the previous proposal

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2815  Respondent: 10756961 / Carol Marsh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Site A35 Former Wisley Airfield

- The size increase proposed to 95.9 hectares at the site A35 Former Wisley Airfield means that the volume of traffic which will be using Ripley High Street and local roads will cause congestion and pollution. Nitrous oxide levels are already above safe levels and speeding traffic through rural villages is a danger to local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp172/2816</th>
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</table>

Site A35 Former Wisley Airfield

- The size increase proposed to 95.9 hectares at the site A35 Former Wisley Airfield means that the volume of traffic which will be using Ripley High Street and local roads will cause congestion and pollution. Nitrous oxide levels are already above safe levels and speeding traffic through rural villages is a danger to local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>
Site A42 in Tannery Lane

- The increase in housing from 45 to 60 at site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network within and around Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/2811  Respondent:  10756961 / Carol Marsh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 Garlicks Arch

- Housing at this site would be on Greenbelt land.

- The potential increase from 400 houses at site A43 Garlicks Arch is extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon, and will cause coalescence of these villages

- The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation. The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/2813  Respondent:  10756961 / Carol Marsh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A58 Burnt Common

- The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

- The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, tucked away in policy 4.4.23a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4932  Respondent: 10757121 / Tony Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3724  Respondent: 10757185 / Liz George  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Send road is already overloaded with traffic, it will become gridlocked increasing noise and pollution levels even further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2728</th>
<th>Respondent: 10757185 / Liz George</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
</tr>
</tbody>
</table>

I object to :-

- Send village being removed from the green belt
- 400 houses and industrial space at Garlicks Arch
- 45 houses at Clockburn Nursery
- 40 houses and two travellers pitches at Send Hill New interchange at A3 at Burnt Common

Send road is already overloaded with traffic, it will become gridlocked increasing noise and pollution levels even further.

Proper use of Brownfield sites ie Slyfield mean that this green belt area is not needed. Plans for 64 apartments and a Marina are already in place. A smaller plan for under 50 properties in total should be considered with other villages throughout the Borough accepting similar proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPA16/3725</th>
<th>Respondent: 10757185 / Liz George</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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</table>
Plans for 64 apartments and a Marina are already in place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10757185 / Liz George</th>
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45 houses at Clockburn Nursery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7052</th>
<th>Respondent: 10757185 / Liz George</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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400 houses and industrial space at Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7055</th>
<th>Respondent: 10757185 / Liz George</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
New interchange at A3 at Burnt Common = 5 Individual Objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7054  Respondent: 10757185 / Liz George  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

40 houses and two travellers pitches at Send Hill

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15683  Respondent: 10757185 / Liz George  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send village being removed from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15684  Respondent: 10757185 / Liz George  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Proper use of Brownfield sites ie Slyfield mean that this green belt area is not needed.

A smaller plan for under 50 properties in total should be considered with other villages throughout the Borough accepting similar proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPA16/1741</th>
<th>Respondent: 10757537 / K.M. Bromley</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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I object to the GBC Local Plan 2016, as it affects Normandy for the following reasons.

Extra pressure on existing roads in the parish, which will be unable to cope with the increased traffic.

Increased flood risk in adjacent areas. Concrete doesn’t absorb rainwater.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1252</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1253  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA Teport methodology is Ibelieve inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2274  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is unlikely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
1. I **OBJECT** to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2276</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
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1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common.

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **I OBJECT** to the damage to the historic environment as a result of the scale of the proposed development (Policy 03)

**I OBJECT** to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4975  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

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1. **I OBJECT** to the sustainable employment policy

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4979  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. **OBJECT** to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4981  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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1. **OBJECT** to the loss of rural employment

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5025  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge.

1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5021  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4995  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclist past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4997</th>
<th>Respondent: 10758593 / Richard &amp; Delia Baker</th>
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I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5000  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25

There is no certainty that either A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5001  **Respondent:** 10758593 / Richard & Delia Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I OBJECT to poor air quality concerns.

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4971  Respondent: 10758593 / Richard & Delia Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land is to be taken from the Green Belt) Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4973  Respondent: 10758593 / Richard & Delia Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **OBJECT** to development in areas which are at risk of flooding

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **OBJECT** to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are just unsuitable because they are unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4963  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to the Borough Wide Strategy

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the
   borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable
   and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration.
   These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough
   area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or
   study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work
   elsewhere, and half who work here live outside the borough. A short, half-hour, commute puts the borough
   within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West;
   but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford
   town centre; is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or
   that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the
   London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no
   public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready
   alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing
   numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents
   are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford
   wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over
   100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north
   east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border)
   (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in
   36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at
   present these three Wards represent only about 11% of the existing housing in the borough, they are very much
   rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5
miles. It will result in coalescence and the merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My principal ground for objecting to the scheme is the considerable additional road traffic and consequent pollution which will be generated by the scheme and which will exacerbate what is already an unsustainable situation. In addition the present means of access to this area of land via Keens Lane and/or Tangley Lane is totally unsuitable being very narrow and in parts barely passable by two cars. In addition specific areas of the access roads are dangerous as there are blind spots which could easily lead to traffic collisions.

My husband and I have lived on the Keens Park development just off Keens Lane since 1983. We have brought up our two sons during that period and from 1983 to date have regularly travelled to and from Guildford town centre. I can therefore speak with considerable experience and knowledge gained over a period of 30 years of the problems encountered in driving to and from the town centre from this area and how further development cannot be sustained.

It is proposed that there should be 140 homes built on this site together with a 60 bed care home. It is noted that there has been an increase in the number of care home beds since the original proposal in 2014 of 50 beds.

1. The site as shown edged blue on the plan included with the Local Plan document does not give any indication of how access would be gained to the development. The boundary does not appear to be immediately adjacent to the A322 Worplesdon Road and the only roads bordering the site are Keens Lane and the Tangley Lane extension of Gravetts Lane. It is difficult to envisage what interventions the Highway Authority might have to undertake to enable access to the site. Keens Lane is for the most part barely passable by two cars, particularly the section immediately between the turning into what used to be Hones scrapyard and Keen Park Road. I have had my wing mirror shattered by a passing driver who did not slow down to take account of this narrow section and it requires two cars to pass slowly and with care or for one to give way to the other. It also narrows considerably immediately adjacent to the new development at Morgan Close/67 Keens Lane and there would not appear to be scope for widening at the point adjacent to the Findlay Drive/Sime Close intersections as there are existing houses on each side of the road. The narrowing of the road at this point also creates what is effectively a “blind bend”. Those of us who have lived in the area for many years instinctively slow down at this point as the lane is frequently used by horse riders, as indeed is Gravetts Lane. However, drivers who are not familiar with the road and these potential hazards frequently approach this area at speed and it is very likely an accident will occur. Indeed I have witnessed a horse rider who had either fallen off her horse at this point or been affected by a road traffic incident. If there are any large vehicles in the area such as refuse lorries, delivery vans, etc the road either becomes impassable or it may be necessary for cars to mount the pavement to get by. There is also only pavement on one side of Keens Lane. The Gravetts Lane/Tangley Lane extension leading from the mini-roundabout at the top of Gravetts Lane up Tangley Lane to the A322 is also very narrow and bendy with a blind bend immediately beyond the Riding Stables and no pavement after this point either. It would therefore be impossible for 140 homes to be accessed via Keens Lane or via the Gravetts Lane/Tangley Lane extension without considerable redevelopment of these roads and the possible compulsory acquisition of properties adjoining the road to make this possible. The Plan refers to one of the opportunities offered being “encourage cycling and pedestrian movements from the site”. Unless there are major improvements in the access roads mentioned above, i.e. Keens Lane, Tangley Lane and Gravetts Lane then the additional traffic generated by this development will make any form of cycling or pedestrian use particularly hazardous. Many children and their parents use these roads to access the primary school at Fairlands and I have often encountered parents cycling with their small children and attempting to shield them from cars travelling at high speed along these three roads. Cars are parked all along one side of Gravetts Lane adjacent to the houses and these create another “blind area” for vehicles approaching either from the Tangley Lane end or the Aldershot Road end as it is not always possible to see in time when a vehicle is approaching.

1. The 140 homes proposed for this site could potentially mean an additional 280 vehicles will be added to those presently using this part of the Borough. Considerable additional traffic will therefore be generated. If they do not access the proposed site via Keens Lane and/or Gravetts Lane/Tangley Lane they will be using these roads to gain access to the town centre via either the A322 Worplesdon Road or the A323 Aldershot Road. No Park and Ride facility exists on this side of Guildford town centre to alleviate the large number of cars using both the Worplesdon Road and the Aldershot Road and this would have constituted a far better use of this area of land rather than further housing development.
1. In addition to the proposed homes I note that there is to be a 60 bed care home. I do not know if this is intended to be a Council care home or a private home. You will be aware that we already have a 78 bed private care home, Worplesdon View Care Home, run by Barchester Healthcare immediately adjacent to the proposed development. Is it necessary for another home to be sited immediately alongside this existing home? Within a very small radius of Keens Lane there are also other recently constructed private care homes, namely Claremont Court (57 beds) in Harts Gardens, and Queen Elizabeth Park (77 beds) at 1-72 Hallowes Close. A further 60 bed care home is also proposed at Normandy, Policy 46, under the Plan under consideration. Additional traffic will also be generated with residents’ visitors, emergency vehicles, doctors’ cars, staff and trade vehicles. Even allowing for the increase in the ageing population I do not consider it necessary to construct yet another home in this particular area with the consequent loss of the Green Belt land on which it is to be built.

1. In order to understand the complexity of the traffic situation as it presently is before any additional development has taken place I will explain how I am affected. I leave home during the week at approximately 8.20 am in order to go to work. As anyone who lives in the area knows once you turn out of Keens Lane onto the A322 the road to Guildford is generally already at a standstill at this time with the rush-hour traffic. Indeed you can wait several minutes before it is possible to even join the roundabout at this junction because of traffic already on the road, traffic joining from Cumberland Avenue and traffic coming from Guildford towards Worplesdon. The situation has deteriorated steadily over the past 10-15 years and traffic has increased considerably with the development of the Queen Elizabeth Park. It is now so bad that I do not even attempt to take the A322 to Guildford but instead use the A323 Aldershott Road. The problem is alleviated in the Summer months when people are away on holiday and the schools have broken up but from September to early April the congestion is a daily occurrence and a 2.5 mile journey into Guildford Centre can on occasion take 45 minutes or longer. Should any additional incidents occur such as an accident on the A3 or the surrounding roads then complete gridlock ensues. In these circumstances it is virtually impossible to find any alternative route. Motorists will leave the A322 via Keens Lane/Gravetts Lane and also Shepherds Lane to join the Aldershot Road where a similar situation usually prevails. This is because both of these two major roads funnel into the Woodbridge Hill junction with the A3 at the Dennis Roundabout which creates a bottleneck for all traffic coming from the North side of Guildford. This is another reason why a Park and Ride facility should be seriously considered for North Guildford and/or improved public transport links.

1. My own journey to work in Guildford town centre is now undertaken via the A323 Aldershott Road. This is not simply because the A322 Worplesdon Road is virtually at a standstill but because of the problems encountered with both the A322 and the A323 both funneling into the A3 at the Dennis Roundabout as mentioned above. When considering your journey to Guildford from the Worplesdon/Fairlands side of the town this has to be borne in mind and as mentioned previously any incident on the A3 can result in total gridlock and chaos. This is either because traffic is unable to join the A3 heading South on the slip road thereby backing up into the Worplesdon and Aldershot Roads or alternatively traffic may be forced to leave the A3 at the North bound slip road and divert through the town centre causing the same problem.

1. Gravetts Lane has become increasingly busy in recent years. At one time I could drive down this road in the early morning rush hour and not encounter one car coming the other way. However, with the additional traffic on the A322 and to some extent the developments at Morgan Close and Sime Close in Keens Lane the traffic has increased and you will now meet traffic coming in both directions. Many of these motorists are cutting through from the Worplesdon Road to the Aldershot Road and vice versa. At certain times of the day cars are parked all along one side of Gravetts Lane and it is not always possible to see cars coming in the other direction before they are almost upon you. This adds to the danger to pedestrians and cyclists on the road particularly with small children using the road to go to school at Fairlands and horse riders also using the road at quieter times of the day.

1. When I turn out of Gravetts Lane onto the A323 at 8.20 am the traffic is at a complete standstill during the months from September to mid-April. It can take up to 20 minutes to reach the roundabout at Rydes Hill School where I turn off to continue my journey through Park Barn. This is a regular route taken by local motorists to avoid both the A322 and A323 traffic congestion. However, it is not a total answer to the problem because when you reach the Southway/Egerton Road roundabout traffic builds up coming down Park Barn Drive and entering from Southway and again there is congestion and delay. Many motorists now try to avoid this by by diverting via Barnwood Road and Cabell Road in order to have the right of way at the Southway roundabout. This all
contributes to the danger to pedestrians in the area. There are two schools, namely Kings College secondary school and Guildford Grove Primary School in Park Barn so there are many children negotiating the immediate roads including mothers with pushchairs and small children. The road in front of Guildford Grove Primary School is frequently blocked by cars parked outside the shopping parade and outside the school and the use of Cabell Road/Southway as a “rat run” must make the likelihood of an accident far higher. In addition, the proximity of the Royal Surrey County Hospital means additional traffic heading for the hospital including emergency ambulances. There has been a slight improvement with the installation of the traffic lights outside the Royal Surrey County Hospital but it is not until this point is gained that any real progress can be made. My point in explaining all this in considerable detail is that the present situation of congestion on the A322 and A323 cannot be avoided merely by taking an alternative route from the North side of Guildford and the existing roads are already at saturation point.

1. The situation is no different when returning home in the evening during the rush-hour. If you take the shortest route out of Guildford town centre via Walnut Tree Close then you first of all have to negotiate the congestion immediately outside the station entrance where there is insufficient room for two cars to pass because parking is allowed outside the flats immediately beyond the station. During the winter months and early Spring traffic grinds to a halt well before the bend near Topps Tiles and you can sit in a jam here for at least 40 minutes waiting to reach the end of the road and gain access to the A3/Ladymead junction. Once caught in this jam there is no way out because of the confines of the River Wey and the railway line. Once you have reached the Ladymead junction it is virtually impossible to turn out into the traffic. Motorists take no notice of the yellow box junction and you have to push your way out into two stationary lines of traffic in order to head towards the A3 and the Wooden Bridge turn off to the A322. The route down Woodbridge Road is similarly busy and then funnels into the same congested two lanes.

1. If you choose to come into Guildford via the A320 Woking Road the same congestion occurs at the Stoke Road roundabout with two lanes of traffic turning right to join the A3/Ladymead bypass. Traffic coming from Woodbridge Hill towards Guildford and turning right into Woodbridge Road is also immediately reduced from two lanes at the traffic lights to one lane in Woodbridge Road (because of the bus lane). This has a further funnelling effect plus numerous incidents of road rage as drivers endeavour to push into the offside lane before the bus lane starts.

1. All of the above points need to be taken into account by the Highway Authority when considering these developments because most of the people living in these houses will require access to Guildford town centre for their work, shopping requirements, schools, hospital treatment, etc. I believe the situation is already worse than it was in 2014 when I previously objected to this proposed development. Other proposals in the new Plan for 1,150 houses at Normandy, Policies A46 and A47, can only make the situation intolerable.

1. Mention should also be made of the consequent considerable pollution arising from roads leading into Guildford being filled with stationary vehicles emitting noxious exhaust fumes. Are we seriously proposing to encourage cycling and pedestrian movements in this sort of environment and is this what we want for our children on their journeys to school? Residents in the Keens Lane/Gravettes Lane/Aldershot Road and Worpleston Road areas will also be subject to months of heavy lorries, cement mixers, noise, traffic delays, pollution, dust and roads being dug up constantly for connection to services whilst these proposed areas are developed should the Council decide to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object because there is no provision for education facilities to cover the increased demand.

8) I object because of the lack of any planning to provide the facilities to cover increased demand for health cover at surgeries and for hospitals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2062  Respondent: 10764385 / E.E Whearley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the proposals as there is hardly any evidence for so many houses and certainly none for industrial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2057  Respondent: 10764385 / E.E Whearley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the over development in the particular areas of Send and Ripley.

I object because of a limited consultation period for the plan.

I object because new sites were included with less than 2 weeks notice.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10764385 / E.E Whearley</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I object to the development of Garlick's Arch, it is Green Belt and historic woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed on/off ramp to A3 at Burnt Common as both Ripley and Send would be even more congested and/ became traffic 'Rat runs'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I have tried to keep my objections short but I will make a further comment.

Village are a very important part of our community in this country and the views of the residents should be an important part of any development considered by an elected council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to erosion of the Green Belt. The erosion of special spaces in and around our villages are essential for wildlife and for these people who cannot travel far ahead to appreciate space and freedom.

2. I object to villages loving this insetting removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the Policy A42 change in Tannery Lane because:

1. No proof of need of sudden increase from 45 to 60 houses.
2. Flooding problems not considered.
3. Traffic situation through Send and Ripley already a major issue.
4. Infrastructure will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/461  Respondent: 10764385 / E.E Whearley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 changes at Garlicks Arch because:

1. No exceptional circumstances exist to lose Green Belt Land.
2. This wood dates from the time of Elizabeth 1st and should not be lost in the time of Elizabeth 2nd.
3. No special circumstances exist to justify 400 homes and 6 travelling showpeople plots.
4. Valuable Green Belt land sustains village life, promotes area of natural beauty and defines villages, we do not want to become suburbs of Guildford or Woking.
5. The traffic situation of key times is a major problem in both Send and Ripley. Such a massive development will increase the problem enormously.
6. There is no proof of such a large increase in demand for housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/462  Respondent: 10764385 / E.E Whearley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58 at Burnt Common because:

1. The demand for industrial and/or warehouse sites declined.
2. Where is proof of need when Slyfields and Guildford have empty sites and industrial units.
3. Why destroy Green Belt land unnecessarily
4. The traffic impact will be disastrous to the local roads through Send, Ripley and Clandon. Gridlock inevitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2938  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints
should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6012  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near Shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burnt Common and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see above and below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. To allow this would be plain irresponsible.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6017  Respondent: 10765249 / Andy & Sonja Freebody  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the
so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the
redevelopment of the school was not essential. As and when it became essential Government funding would become
available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being
unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the
pavement- often at speed. It has narrow bends with poor sight lines, an infant school and a hump-backed bridge concealing
the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the
road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current
“soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c),
general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the
removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly
acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from
the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.
Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the
Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been complied with for this site. This only came to light for local residents following a
Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so
there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services
in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer
a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There
are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders
(Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the
woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The
development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The
Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services
such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any
residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no
requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/12215</th>
<th>Respondent: 10765249 / Andy &amp; Sonja Freebody</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 10765249 / Andy &amp; Sonja Freebody</th>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is
likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12206  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12210  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12275  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12251  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or no force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12267  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. This will increase the risk of serious accidents.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon where I live, already suffer from intolerable traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network, phone and broadband and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital; where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. This is clearly a huge flaw in the plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12194  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/12198  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12182  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/1446</th>
<th>Respondent: 10765249 / Andy &amp; Sonja Freebody</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SQLP16/1450 | Respondent: 10765249 / Andy & Sonja Freebody | Agent: |
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites— which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1454  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/222  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policies A37, 38, 40, 42, 44 & 45 – My Objections**

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2093  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/72  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Non-plan Items– My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as
possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Village life is part of the English culture and heritage. If building on green belt is allowed when it is not absolutely necessary our rural life style and the community nature of our villages, which is very prominent in West Clandon will be removed for ever. The green belt if there partly to stop our country being changed, so I feel strongly that it should be upheld and not built on. I want my children and grandchildren to be able to grow up in a green surrey village in the way that I have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3763  Respondent: 10765505 / Nick Barlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having lived in West Horsley for the last 12 years, I have been recently presented with some facts about the suggested Guildford borough plan 2016.

The areas marked for development are vast and clearly inappropriate for the Horsleys. The volume of the housing that could potentially be developed would severely compromise an already struggling village in my opinion.

The majority of the residents in both west and east horsley are retired or elderly individuals and young families. The health center is already at its maximum as are the parking areas in and around the village on weekdays & weekends. Has there been any consideration at all as to the effect a further 500 homes (or 1500 cars) will have on the infrastructure of the village?? How will the existing long standing residents of this beautiful village get around when many have their only means of transport as a car?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3765  Respondent: 10765505 / Nick Barlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<td>I am utterly opposed to the suggestions for the local plan on the basis that it is simply not a viable suggestion to the village, its roads, and its long standing residents. I believe we should be thankful to have such a beautiful village in Surrey, and that the Horsleys should firmly remain part of the green belt – not subject to mass development.</td>
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<td>4). I object to the inclusion of the land at Garlick's Arch, Send Marsh / Burnt Common and Ripley (A43).</td>
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<tr>
<td>Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it's removal from the Green Belt (Policy P2).</td>
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<tr>
<td>Central Government state clearly that housing need is not an exceptional circumstance.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11757</th>
<th>Respondent: 10768417 / James Ward</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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6). Increase in Traffic.

The inevitable increase in traffic as a result of more housing in this area will create more pollution in the form of exhaust gases and noise which will have an unhealthy affect on residents.

I wish these objections to be fully taken into consideration and that that Plan is amended accordingly,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/11749</th>
<th>Respondent: 10768417 / James Ward</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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2). I object to not protecting the Green Belt (Policy P2).

Removing Ripley, Send and Clandon from the Green Belt is unacceptable.

These are villages that have always been surrounded by agricultural land that gives them their character. Whilst increasing population requires further housing development, large scale plans such as Wisley airfield and Garlick's Arch are innappropiate in such areas and removing these villages from the Green Belt is just an "underhand way”

to allow such developments and more in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
## Comment ID: PSLPP16/11750
### Respondent: 10768417 / James Ward
### Agent: 
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

3). I object to the congestion that the development will cause to the local village roads and the lack of road structure improvement (Policy P3).

The roads around Clandon, Send and Ripley are already congested with frequent long lines of traffic queuing. Narrow roads such as Newark Lane and Rose Lane already struggle with the present amount of traffic.

Crossing the road as a pedestrian in these villages can be dangerous.

Walking from Grove Heath North to the High Street in Ripley requires crossing Rose Lane often between cars waiting in this road turning left or right into the High Street. This crossing of Rose Lane is not pedestrian friendly and one day someone will get hurt or killed. Any further increase in traffic will only make matters worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

## Comment ID: PSLPP16/11747
### Respondent: 10768417 / James Ward
### Agent: 
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016) for the following reasons:

1). I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Clandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short
period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/11756</th>
<th>Respondent: 10768417 / James Ward</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>5). I object to the Borough Wide Strategy (Policy S2).</td>
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<tr>
<td>The proposal by Guildford Borough Council for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.</td>
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<tr>
<td>The proposals are for too much development in the north east of the borough (Wisley, Ripley &amp; Send). I understand 36% of all the Plans new housing is proposed in this area, which has only 11% of the existing housing.</td>
<td></td>
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<td>Ultimately all this new housing will merge Wisley, Ripley, Send, Clandon all together and they will cease to be villages and become one large urbanisation!</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/3032</th>
<th>Respondent: 10769121 / Ali Elson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>1. APPENDIX C</td>
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<td>I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3031  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3033  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1556 of 3142
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6120  **Respondent:** 10769121 / Ali Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higheotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/12594  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/12608  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12610  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12587   Respondent: 10769121 / Ali Elson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12589   Respondent: 10769121 / Ali Elson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12592</th>
<th>Respondent: 10769121 / Ali Elson</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</strong></td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12614 | Respondent: 10769121 / Ali Elson | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY E6</th>
</tr>
</thead>
<tbody>
<tr>
<td>I OBJECT to Policy E6 - The leisure and visitor experience.</td>
</tr>
</tbody>
</table>

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12604  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12612  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12596  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/12599  **Respondent:** 10769121 / Ali Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY I2</th>
</tr>
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<tbody>
<tr>
<td>I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
</tr>
<tr>
<td>I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).</td>
</tr>
<tr>
<td>Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.</td>
</tr>
<tr>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
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</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/12600  **Respondent:** 10769121 / Ali Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY I3</th>
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<tbody>
<tr>
<td>I OBJECT to poor air quality concerns (Policy I3)</td>
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<tr>
<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12583  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12581  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/12582</th>
<th>Respondent:</th>
<th>10769121 / Ali Elson</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
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The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12616  Respondent: 10769121 / Ali Elson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SLP16/1495</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SLP16/1496 | Respondent: 10769121 / Ali Elson | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together.
with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: SQLP16/1498</th>
<th>Respondent: 10769121 / Ali Elson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: SQLP16/317</th>
<th>Respondent: 10770913 / john prest</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land Availability Assessment (LAA) and Strategy on Sites

It is noted that the land availability assessment was undertaken with the task of reviewing sites which were proposed to be inset from the Green Belt. As a matter of record, there are a number of “discounted sites” which were not considered under the LAA, principally by reason of their not being identified in the Green Belt and Countryside Study. It is our view that the LAA can only be assessed as being correct and valid to the extent that the Green Belt and Countryside Study is itself correct, particularly in the context of this objection and representation by reference to the proposed inset boundary for the village of Effingham. We consider that the discounted sites in particular Lyons Field were discounted erroneously on the assumption that the inset boundary were fixed/agreed/correct which plainly they were not and are not until the plan is adopted.

Notwithstanding the above, and having regard to the land availability of sites within Effingham, these are limited to the following:

1. the Barn (site reference 040 (page number 314-317 of the LAA)) (the "Barn") in respect of which land availability was assessed as being available to accommodate 16 homes (net) (17 gross);
2. Church Street (site reference 99 (page number 317-319 of the LAA). This site’s proposed allocation of houses is 22 net (22 gross);
3. Orchard Wells Beach Avenue (site reference 038 of the LAA) which is stated as being capable of providing five new homes net (6 gross).

This assumes a site plan allocation of sites comprising 43 units (net). We have commented on the extent of the inset boundary above, and stated why we consider that Lyon’s Field along with the remainder of the land shown edged pink on the attached plan, should be included within the inset village boundary of Effingham.

If this is the case, then we consider that Lyon’s Field is far more appropriate to bring forward in terms of land availability for housing. Feasibility of the development of this land has been undertaken and it is submitted that this can adequately provide housing of circa 18-24 units (2/3 bedroom). This assessment has been undertaken notwithstanding that part of the land falls within the zone of influence (within the 5k boundary of the SPA at Effingham Common) and development within such zone of influence would only be used to accommodate a maximum of nine units, in conformity with the SANG regulations proposed by the local plan.

Availability of the Barn

In terms of the LAA and its review of the three sites within Effingham above referred, we have the following comments in relation to the Barn.
It is evident that no feasibility study has ever been undertaken as to the suitability for development of the Barn for 16 units as proposed in the LAA. Furthermore, (notwithstanding the comments above referred regarding the sprawl of Effingham westwards, by reference to the proposed inset boundary proposed by the draft plan (to which this letter forms an objection)), it is submitted that the Barn site is not capable of providing 16 net units (even if our objections regarding the sprawl of the inset boundary westwards for which there is no justification, is not upheld).

The reason for this is that access to this site is extremely limited being a single track (currently used on a two-way basis with the six retail units fronting the Street), and which also serves as a footpath/bridleway. This access is not owned by the proprietors of the Barn and therefore cannot be improved and there is limited or no scope for widening. The local highway authority states that not more than five dwellings should be provided from a single point of access. Arguably, this is already provided by the means of access to the retail units and the Barn itself. To extend the use of the single track for an additional 16 units (net) (i.e. 17 units) is not feasible or capable of being achieved without another form of access being provided acceptable in highway terms, and which may necessitate the demolition of two or more additional dwellings in the Street to provide the same. This is not feasible on viability grounds.

Accordingly, it is submitted in our view that the provision of 16 units on this site is significantly optimistic and incapable of being provided. A more objective and realistic assessment of this site in terms of housing would be the provision of an additional four dwellings created by the refurbishment of the Barn building itself, although this will still have delivery issues on highway grounds.

In addition, we would also question the development of the Barn having regard to the historic nature of the Barn building itself. Whilst it is acknowledged that this is not a listed building and was relocated and reconstructed in its current position from an existing Sussex barn in Sussex in the late 1950’s, this building still has an historic interest and value to Effingham. Its walled garden is consistent with a village environment and a classic “English garden” which is synonymous with English villages.

**Housing Need**

It is evident from the local plan and the LAA that the Council considers that provision within the plan period (to 2033) of an additional 43 dwellings within Effingham is sufficient to meet Effingham’s housing need and to assist the wider borough’s housing supply requirement. This is to be construed with the recent planning permission granted for 6 x 1 bedroomed flats to be built on the A246 near Sibley’s newsagents (i.e. 49 in total).

The Emerging Neighbourhood Plan considers that Effingham’s housing need is in the region of 62 dwellings over the plan period following the undertaking of a local housing needs assessment. The proposal to “earmark” Brown's Lane Field (parcel 1 on the attached plan) for future development post-plan period, is insensitive and not appropriate for the reasons above stated.

It is clear that there may be a challenge on Effingham to provide sufficient dwellings for its residents (in particular, younger residents) within the plan period on the proposals set out in the LAA for reasons above stated. We have severe concerns as to the correctness of this or indeed its ability to meet housing demand in the village. We totally endorse the neighbourhood plan’s proposals for selecting sites in the village envelope although we do not agree that the Barn will able provide the numbers of dwellings to which the LAA infers.

Realistically, and having regard to our comments in relation to the Barn and its capacity for development, the availability for housing in Effingham is as follows:

1. the Barn: 4 units (net);
2. Church Street: 22 units (net); and
3. Orchards Wells: 5 units (net).

Total: 31 units.

According to Effingham Parish Council’s assessment there is a need for 62 units (of which 6 units have already been satisfied (re Sibley’s). Accordingly, there is likely to be a shortfall of required housing need in Effingham of circa 21 units in the plan period - excluding windfalls of which, in Effingham, the opportunities are limited.
It is for this reason we advocate that the land known as Lyon’s Field (shown coloured pink and hatched blue on the attached plan) should be included within the land availability assessment as being suitable for development. It is understood that this land is immediately available for development and feasibility assessments have been undertaken to detail its availability to accommodate anything from 18-24 units. In light of this, we respectfully request that you review the Land Availability Assessment, in particular terms of the feasibility of delivering the number of dwellings suggested for the Barn and also consider in light of the evidence from Effingham Parish Council as to its assessment of housing need within Effingham, that Lyon’s Field is included within the inset boundary and assessed as being suitable for development in terms of land availability to meet housing supply. Furthermore, for reasons above stated, we respectfully would suggest that Brown’s Field (parcel 1) is removed from the inset boundary (i.e. included within Green Belt) and not earmarked for future development post-plan period.

If the Council are not minded to include the land edged pink within the inset boundary then we would respectfully request that they consider including Lyon’s Field within the inset boundary on a safeguarded basis (in lieu of Brown’s Lane Field) as land marked for future development in a post-plan period. However, we strongly argue and object to its exclusion from the inset boundary for reasons above stated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4097  Respondent: 10771105 / Effingham Residents Co Ltd (Andrew Bedford)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have had an opportunity of reviewing the Council’s proposals in respect of the draft local plan (Strategy on Sites 2016) our main comments relate to the impact of the local plan insofar as it relates to the village of Effingham. Accordingly our comments are with reference to:

1. Policy P2: insofar as it relates to Effingham/Green Belt; and
2. The extent of the Inset boundary of Effingham proposed in the draft local plan (Page 338).
3. **Policy P2 Green Belt (page 49)**

We are concerned with the concept of “limited infilling” and having regard to the proposed designation of Effingham within the local plan as an inset village. We consider that it is important that the inset boundary truly reflects as a matter of fact on the ground, the extent of the relevant village. In our view, the inset boundary insofar as it relates to Effingham, should consider incorporating within that inset boundary all land which is on the ground, within the village and to exclude from the inset boundary any lands which are plainly currently outside the existing village boundary or indeed do not comprise “infilling” in the context of the NPPF, within the current confines of the village boundary.

We are aware of the five essential characteristics of Green Belt which are advocated by the NPPF.

1. **Effingham Inset Boundary (Appendix F), (Page 338 Proposed Submission of Local Plan)**

The attached plan illustrates the extent of the proposed new inset boundary surrounding Effingham village beyond which is to be designated Green Belt.
We would wish to object and for representations to be made, for those parcels of land which are numbered 1-6 on the attached plan (and coloured yellow) to be excluded from the Inset Area of the village for the following reasons:

- **Parcel 1** (Extension of part of Howard of Effingham School)

This land is plainly not within the village and also, still contributes to the fundamental aim of the purposes of the Green Belt (as advocated by the NPPF) in that:

- it prevents urban sprawl and coalescence of Effingham towards Bookham;
- it checks the unrestricted sprawl of the village beyond its natural boundaries;
- it safeguards the countryside (it being opposite to open green space (Effingham Lodge Farm) and adjacent to a continuation of green space with the adjoining land within Mole Valley’s boundary).

If ever it is considered that this land was suitable for redevelopment for the benefit of the school or otherwise, then there is no reason why an application could be considered for development in Green Belt but having the need to prove exceptional circumstances (page 83, NPPF) justifying the development of Green Belt land. There is certainly no prima facie justification for this land’s inclusion within the inset boundary/village boundary of Effingham. Furthermore, it is not advocated in the LAA as land contributing towards the Council’s housing supply. Accordingly it should be removed from being within the Inset Boundary.

- **Parcel 2** (Open Space amenity land at the rear of Middle Farm Place)

This was transferred to the Council for open space purposes by the developer of Middle Farm Place back in 1991 by way of a Section 106 planning gain. This parcel also includes the three adjacent dwellings adjoining Oreston Lane.

This land should be excluded as whilst it is a village amenity, it is open space and also checks the unrestricted sprawl of the western boundary of the village westwards where there exists a clear current delineation of the village boundary. It is also advocated to be removed from the inset boundary in order to preserve the setting and character of the village and safeguard the countryside. The maintenance of the village delineation on its western boundary should be retained in its current position to avoid a “creep” into Home Farm and the reduction of this open farm land and visually and historically important aspect to the village, particularly when seen on entering the village from Horsley on the A246. This boundary/delineation alone sets the scene for the village in its current environment.

- **Parcel 3** (Agricultural land/buildings at Home Farm) and **Parcel 5** (Existing Allotment Gardens)

The comments relating to the Middle Farm Place amenity area (Parcel 2) are equally applicable in respect of Parcels 3 and 5 in terms of ensuring a check on the unrestricted sprawl of the village from its current western boundary delineation. It is not a coincidence that Parcels 2, 3 and 5 are owned by the local authority although their justification to be included within the Inset boundary is completely unwarranted and does not reflect the extent of the village ‘on the ground’. The comments relating to Parcel 2 are reiterated in relation to Parcels 3 and 5 terms of the need to safeguard the countryside, preserve the setting and character of the village and to check the unrestricted sprawl of the village from its current western boundary.

- **Parcel 4** (the Barn)

For similar reasons as stated above in relation to parcels 2, 3 and 5, the inset boundary should not be extended into the countryside by permitting this land to be included within the inset boundary and therefore potentially developed.

Our concerns about the ability to develop this land (it is stated as being one of the sites referred to in the LAA as being available) are set out later in this e-mail. However, notwithstanding that it is and comprises a walled garden, it is still an important contribution towards safeguarding the countryside and the sprawl of the western boundary of the village into the existing countryside. Accordingly, we strongly object to its inclusion within the inset boundary.

- **Parcel 6** (Brown’s Land Field)

This land has been the subject of recent publicity as being included within the recent Howard of Effingham planning application for housing. It was robustly refused by the local planning authority for development. We are at a loss to
explain as to why it has been included as “safeguarded land” within the inset boundary on the premise that it is, in accordance with the local plan policy, being safeguarded “to meet the development needs beyond the plan period”. It is our view that for the purposes of this plan, this land should be removed from within the inset boundary. If, following the expiry of the plan period, a new local plan is introduced and it is considered meritorous at that time that this land be included (whether for housing supply reasons or otherwise) then that will be for a matter of public scrutiny and review on a democratic basis at that time. Currently, this land forms an immediate green aspect when exiting the crossroads at the A246 and the swathe of open land afforded by the KGV playing field. It also is an instrumental aspect of the use by Effingham and Leatherhead Rugby Club which is an important amenity and economic driver for the maintenance of KGV which remains a highly significant and very important aspect and amenity of Effingham village generally.

- Land Edged Pink

Notwithstanding the objections above referred relating to the exclusion of certain areas within the proposed inset area of Effingham village within the initial draft local plan, we are also at a loss to explain why an important aspect of the village has not been included within the inset boundary.

We strongly advocate that the land shown edged pink on the attached plan should be included within the inset boundary. First, it is an intrinsic part of the village comprising St Lawrence School, a former convent, adjacent church and the adjacent British Legion (the latter being a relatively poor quality part of the village but nevertheless part of the village). All of this land ‘in the ground’ forms part of the village! How can the authority advocate including parcels 1–6– none of which are ‘on the ground’ in the village but seek to continue to exclude the land coloured pink which in our view within the fabric of the village, being less than 50 yards to the two village pubs in the village (and in the inset boundary!)

The land coloured pink on the attached plan also includes a small piece of land adjacent to the St Lawrence Primary School Playing Fields, which is wedged between the school playing field and Effingham Common Road, immediately opposite the Leewood Way development. This land is shown hatched blue on the attached plan (Lyon’s Field).

Arguably, this land already comprises “limited infilling” permitted under green belt policy. This land is locally known as “Lyon’s Field” to which we draw reference later in this e-mail as to why it should be included on grounds of suitability and availability. We consider the land shown edged pink on the attached plan is and contributes far more towards the village and is an inherent part of the village than those areas which we have sought to advocate removal. We also advocate the inclusion of that part of the land shown coloured pink and hatched blue as part of the inset plan on the basis that this land can be or could be provided for housing to meet Effingham’s housing requirements in the plan period as advocated by the Emerging Effingham Neighbourhood Plan.

We strongly advocate that the inset boundary is extended to include the land shown coloured pink for the reasons above stated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160708141056781.pdf (725 KB)
We have had an opportunity of reviewing the Council’s proposals in respect of the draft local plan (Strategy on Sites 2016) our main comments relate to the impact of the local plan insofar as it relates to the village of Effingham. Accordingly our comments are with reference to:

1. Policy P2: insofar as it relates to Effingham/Green Belt; and
2. The extent of the Inset boundary of Effingham proposed in the draft local plan (Page 338).
3. Policy P2 Green Belt (page 49)

We are concerned with the concept of “limited infilling” and having regard to the proposed designation of Effingham within the local plan as an inset village. We consider that it is important that the inset boundary truly reflects as a matter of fact on the ground, the extent of the relevant village. In our view, the inset boundary insofar as it relates to Effingham, should consider incorporating within that inset boundary all land which is on the ground, within the village and to exclude from the inset boundary any lands which are plainly currently outside the existing village boundary or indeed do not comprise “infilling” in the context of the NPPF, within the current confines of the village boundary.

We are aware of the five essential characteristics of Green Belt which are advocated by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/725  Respondent: 10771137 / Lucy Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to request that you add the Electric Theatre - alongside the Yvonne Arnaud and GLive- into Policy E6: the leisure and visitor centre, paragraph 4.4.54.

The Electric Theatre is an important part of the entertainment, cultural and community service provided to the borough and should be identified and safeguarded through inclusion in the Local Plan,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4046  Respondent: 10771521 / J Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Further to reading the new local plan. I wish to express my objections to large parts of it especially the area of Send village which is where I grew up. This is point A40-A44 inclusive on the online plan. I would like to say that this is a rural village and should stay as one and the number of new homes being built within the village and that of Ripley reduced greatly. He traffic will be terrible and I object to the green belt being built upon. We should be preserving these green villages and should look to a lesser amount of homes or an alternative. Also I object to the amount of extra pollution from the amount of cars in the village will produce and also that from the proposed industrial sites. I object to the sheer scale of proposals and would like the green village to remain a green village!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: GBC Local Plan - SPC Takeaway for Residents 14 June 2016.pdf (1.7 MB)
Further points to note are the infrastructure is simply not in place to accommodate such development, indeed the railway bridge on Westwood lane is becoming quite dangerous at peak times and I suspect this will require traffic lights at some point before a serious accident occurs. We also know that Glaziers lane has been used as a "rat run" to the Hogs Back for large heavy goods vehicles and the road is just not suitable for that type and volume of traffic. Having met a HGV coming the other way on the railway bridge by Wanborough station on more than one occasion I can say from experience how frightening the experience is!

The weight of traffic entering Guildford, from all directions, as a result of the Local Plan proposals will greatly worsen what is already a standstill at peak times. The current road system cannot cope with current levels of traffic and much work needs to be completed before more traffic is introduced.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/11  Respondent: 10772865 / Peter Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in response to the proposals of the Local Plan and in particular the amount and distribution of new housing proposed which is grossly excessive.

Whilst I fully appreciate new housing is required I believe there is sufficient brown field sites both in and around Guildford which should be utilised first and foremost and the idea of removing Green Belt from our borough, and indeed county, is one I am strongly opposed too.

This Green Belt land has said status for good reasons and we must protect and preserve it for ourselves and future generations. There is also an abundance of wildlife and much of the Green Belt is very close to Areas of Outstanding Natural Beauty which will be diminished should the Green Belt be eroded. The Green Belt land is part of what makes our Borough, and indeed our County, great. Once it is gone, it is gone.

In closing I request that the size of the proposed developments are significantly reduced to more sustainable figures and that brownfield sites are given preference over the Green Belt and green field sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/12  Respondent: 10772865 / Peter Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Having reviewed the proposals for additional housing in Normandy specifically I feel this is grossly excessive and will serve to dissolve the character of the village. I note two small developments in the area (on Westwood Lane and Beech Lane) which are in keeping due to the discreet nature of their size. Additional smaller pockets of development I have little objection too, as long as they are in keeping with the surroundings and are not excessive, as mentioned above some housing is required and each Borough has a duty to provide some. Although not on the scale proposed and not at the expense of our precious Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14  Respondent: 10772865 / Peter Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Some areas of Normandy are already prone to flooding and development in and on this area will only serve to worsen these problems. We have seen the disastrous effects this can have in other areas and it should be noted that development on the scale proposed will almost certainly introduce similar issues in Normandy and the surrounding areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2167  Respondent: 10772961 / Mary Turnill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am horrified at the suggestion that Guildford Borough Council is even considering building 1100 houses on designated Green Belt Agricultural land. I can think of several reasons why it is inappropriate, but the main ones are as follows:

Lack of consultation with Normandy Village to discover what their requirements are.

The flooding problems which already exist, and which cause raw sewage overflows, creating a health hazard; building on agricultural land which at present provides natural drainage, would cause more flooding as the surface water from the newly concreted development flows downhill to the already overloaded drains.

The supposed need for a Secondary School, which has been denied by all the head teachers of all local schools who say their own schools are undersubscribed, and who could easily cater for the so-called need. Councillor Spooner has said that, should the need for the school be denied, the proposed development would not go ahead.

The increase in traffic from at least 2000 extra cars, all trying to access either the Hogs Back or A323 down country lanes, both of which have hazardous bridges over and under the railway. One minor accident on either the Hogs Back or the A3 causes traffic chaos, and rerouted traffic trying to use the two Normandy lanes. Should the secondary school be built, the extra traffic in the mornings and evenings picking up 900 children would add to the extra chaos.

The adverse effect on the environment. Normandy is in the Green Belt, and provides a welcome country break between the urban areas of Guildford and Aldershot. It also provides a haven for wildlife and the many protected species which exist on the area between the two lanes. In addition, the proposed building site is on non-safeguarded, Red designated Agricultural Green Belt, which according to all the usual safeguards for Green Belt, should not be used for building at all.

Would you please note my strong objections to the proposed development in Normandy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a Burnt Common resident I would like to make it clear that I object to the amount of Green Belt being removed from Send/Ripley in the new local plan.

I object to the way that the Garlick’s Arch development was added to the local plan.

I object the lack of evidence that these high numbers of houses are actually needed.

I object to the fact that we purchased a house on Burnt Common Lane with views over fields and now the local plan want to remove this view and replace with 400 houses + industrial units + slip roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1157  Respondent: 10773025 / Graham Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A42 Clockbarn Nursery additional 15 houses added.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1156  Respondent: 10773025 / Graham Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to raise my **objection** to the revised local plan:

- A43 Garlick’s Arch and the addition of 8 Travelling pitches, is there actually a requirement in the local area?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

A58 Burnt Common warehouse why does the area need an additional industrial estate when we are so close to Slyfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I **OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7687  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

Again the infrastructure required does not seem to have been adders in the plan.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7688  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17012  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17011  Respondent: 10773153 / Miles Palmer  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become a hugely popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17010   Respondent: 10773153 / Miles Palmer   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

The whole point of “Green Belt” is to provide a buffer from the continual pressure of urbanisation. We must protect these areas for the future, they were created for a reason and that principle is need now more than ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT fundamentally to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan does not meet the needs of the community nor does it create a sustainable future for those who come after us.

I have set out below my objection to specific policies and matters within the Plan below.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The development of thousands of homes in the villages to the north of Guildford is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable infrastructure can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/4439</th>
<th>Respondent: 10773153 / Miles Palmer</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4440  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4441  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/546  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/789  Respondent: 10773345 / mavis davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to Send Village being removed from the Green Belt. We were given an election promise by both Government and local councillors that Send would remain in the Green Belt, providing a buffer between Woking and Guildford. There are no special circumstances which would warrant that removal.

• I object to 45 new houses at Clockbarn Nursery. Tannery Lane is narrow and full of bends, and is quite unsuitable for more traffic.

Already it will be overburdened by the planned new houses at the Tannery and by the new marina.

• I object to the planned new houses and industrial development at Garlick's Arch. The site is one of ancient woodland and is liable to flooding.

• I object to the planned development of houses and travellers' sites at Send Hill. The road is too narrow and the actual site contains unsafe landfill material.

• I object to the new interchange with A3 at Burnt Common. All the new housing in the area would generate traffic from A3 M25. Woking and Guildford all passing through the Send Road, which is already impassable at busy times of the day. In particular, people such as myself and my 95 year old husband find the road almost impossible to cross now, and more traffic would render us housebound.

Please show these comments to the Planning Inspector, and please confirm that you have received this communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/128  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The area cannot accommodate a new small town at Wisely for the same reasons. All plans to build on the Wisely airfield should be stopped and the land should be returned to agricultural land as was promised when the airfield was built during World War II.

The latest Guildford Borough Council Proposed Submission Local Plan should be rejected in its entirety for the reasons stated above. The local plan can be done so much better!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/202  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Infrastructure such as water and sewage systems, electricity and gas infrastructure, roads, schools at all levels, railway transportation and parking; all need to be substantially up-graded before the local housing stock can be expanded by many thousands of units as proposed.

2. Health centres and hospital are already being operated at above capacity. Major medical and hospital investments together with new retirement homes are required in this area before a large increase in the population can be allowed.

3. East Horsley cannot accommodate another 533 housing units as proposed for the reasons stated above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/201  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. The greenbelt should not be built on. All plans to build on the greenbelt should be taken out of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/200  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read and considered Guildford Borough Council’s latest Proposed Submission Local Plan and I object to this in the strongest possible way for the reasons stated below:

1. The additional housing units proposed is far too high when compared to the official population forecast for the area. It should be scaled back to reflect the official forecast.
2. Surrey University should build housing units on its car parks allowing housing units in Guilford to be released from student use to use by the general population as low cost housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2506  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at former Wisley airfield, Ockham should not be used for housing, but kept as part of the Green Belt. The revisions proposed does not provide any justification for continuing to include this site within the revised Local Plan. I object most strongly to Site Policy A35, the creation of a new village at Wisley airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/921  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of housing units far too high – it fails to reflect the impact of Brexit which will be severe;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1056  Respondent: 10773409 / Anne Monk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the local plan. Despite the possible need for more houses to be built in this area, I believe that there are many disadvantages of this plan that far outweigh the benefits.

One of the main reasons I, along with many others, object to this plan, is that the increased number of houses will lead to higher levels of congestion. Even though more roads are being built congestion will still rise. This puts the safety of the children at local schools at higher risk. This backs up my argument as to why I object to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1057  Respondent: 10773409 / Anne Monk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A further reason as to why I object is due to the destruction of green belt land. Even if it is in your plans to assign new green belt land, I am sure that in the future this land will also be built on, therefore, it is vitally important to protect the green belt land we have at the moment. I object to the land at Garlick's Arch having 400 houses built on it as it is Green Belt permanently protected by the NPPF which prevents the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.

Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.

Thank-you for taking the time to read this, and I would like this to be passed on to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Firstly, I object to Policy A42 for the change at Clockburn Nursery. The reasons for this statement include: It will create a third more than the previous amount of homes here. This is an unacceptable increase. Tannery Lane is narrow and not designed for lots of cars and this increase in homes will cause a lot of traffic issues. It will become more dangerous for people trying to be fit and healthy, lots of people walk and cycle along here and as a nation trying to encourage exercise and fitness in an age of obesity and health related problems this should be considered not only here but in the rest of the surrounding area where roads are already congested and cycling hazardous. Building into the Greenbelt will impact the local countryside- something that distinguishes this area from that of areas nearer to London and in effect our area will become part of outer London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Secondly, I object to policy A43 for the change at Garlicks arch for the following reasons. One: There is no proven demand for travelling show people plots in this area. Two: It will join Ripley up with Send, defeating the purpose of greenbelt, loosing any sense of the traditional villages. Three- It is subject to frequent flooding- this land needs to be there to prevent issues flooding other houses downstream of the river. Four- It will create excessive traffic. Over the last 20 years the traffic has increased dramatically. If it continues to increase the whole area will become a permanently gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Thirdly, I object to policy A58 of a minimum of 7,000 sq m of industrial warehousing because of the change from ‘maximum’ in the previous plan to ‘minimum’ in the current plan despite a decline in the demand. This is proven by empty sights in Slyfield and Guildford which should all be filled first. The 2017 Emplylment Land need assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough so why has Send been earmarked a huge over allocation of 10 hectares at Send in green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Fourthly, I object to Policy 2 of the proposal to inset Send Business Park from the greenbelt because it there is limited vehicular access and development of this location detracts from the openness of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3338  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6512  Respondent: 10773441  Barry Marshall  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions

• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham

• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6513</th>
<th>Respondent: 10773441 / Barry Marshall</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling
development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13601  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13614  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13598</th>
<th>Respondent: 10773441 / Barry Marshall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and...
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13599  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13607  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13609  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13619  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/13602  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause...
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13603</th>
<th>Respondent: 10773441</th>
<th>Barry Marshall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13594  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/13592  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13593  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a plan that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would require the Council to reassess the situation and the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1607  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1608  Respondent: 10773441 / Barry Marshall  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1609  Respondent: 10773441 / Barry Marshall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together.
with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1610  Respondent: 10773441 / Barry Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4062  Respondent: 10773825 / Pierre Foskett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I also object to evidence and process used for the local plan, an immediate independent review is required, not only have the numbers for the ENLA and SHMA been questioned but since the local plan has been proposed, the vote to leave the European union has significantly changed both economic and population forecasts, any calculations prior to this vote must now be re-assessed.

In summary, the proposals for Send in the local plan must be reassessed, the electorate are not happy and the local plan must be rejected. The plans for Send are not based on an objective view of the village. Send is nowhere near as urban as the issues documents describe and the evidence needs further appraisal. The proposed changes to the green belt and the proposed development sites would have a net loss to nature, local sustainability, the economy, health and well-being of the area. The presumption that Send is capable of sustaining this type of growth with a net gain is ludicrous. The vision for Send is not what the residents want. I would like to remind the council that it is elected to represent the residents of the area and that this lack due care and diligence to the village of Send is an insult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7581  Respondent: 10773825 / Pierre Foskett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the late addition to site A43 at Garlicks Arch Burnt common for development in the Guildford local plan. This is completely unacceptable. It has been submitted late without prior consultation and is simply catastrophic for the area. The proposal is on an unacceptable scale for Send and Ripley villages to remain sustainable. The idea that that access to the A3 would be permitted is a total disaster for the whole area, Send is a settlement predominantly based along the main road of the village – Send Road. If there was access to the A3 at Garlick’s Arch, Send Road would become intolerably congested, unhealthy and unsafe. The A247 already has Send and Clandon schools located dangerously alongside, increases in traffic would risk serious harm to our children. Also the proposal for development on this site is far too large for the area of Send and Ripley to sustain, it will remove ancient woodland within greenbelt and essentially merge the two distinct villages which is the entire essence of greenbelt. Furthermore the local facilities, including, roads, sewerage and school provision are entirely unable to sustain such a development. The proposed size of developments in the plan is incredible; given NPPF 9, “moving from a net loss of bio-diversity to achieving net gains for nature” and NPPF 14, “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16836  Respondent: 10773825 / Pierre Foskett  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land surrounding Send Village from the green belt, many of the areas proposed in the local plan are particularly vulnerable areas of high quality amenity land, in particular the land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering, downstream from Cartbridge in Send. This land is exceptionally important to the setting and appearance of the river Wey and the riverside walkway at this point. It must not be placed at risk of development. As soon as a person descends from the road to the towpath it is quiet, scenic and enshrouded by the woods on the bend on the river. – a huge asset to Send tourism and users of the towpath and river. The woodland in this small area of the southern bank (Send road side) is the largest surviving tree covered area in Send and it sustains a remarkable amount of wildlife, including protected species such as bats, newts and higher order mammals such as deer. This are has an outlook from this site onto open countryside including the Wey corridor and Papercourt SSSI. Significant change in the natural character of the area would occur if any development were to occur. Development along the river Wey definitely contradict NPPF 17, “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;” The planning authority also has a duty to consider the environmental impact of this development (NPPF para 7).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3168  Respondent: 10773825 / Pierre Foskett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Policy A42 change at Clockbarn Nurseries in Tannery Lane because of the increase in traffic this will cause and the safety of the road junctions in the village. There will be further strain in amenities such as schools, medical centres etc which are currently straining under the pressures of recent housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3167  Respondent: 10773825 / Pierre Foskett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 Land at Burnt Common, London Road. This proposal has been changed repeatedly in the local plan since 2014, there is clear uncertainty over its suitability. This is a large allocation of green belt land for industrial use which fails to follow NFFP, in particular chapt 11: ‘Conserving and enhancing the natural environment’. The impact of increased traffic in the local area from the increase of industrial use on this site will affect the heath and environment of the resident of both Send and Ripley. There are inadequate transport links (e.g rail) and the air pollution and safety on local roads will deteriorate, already the main concerns to local residents of Send and Ripley. Any development on this site will increase these issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/1460 | Respondent: | 10773825 / Pierre Foskett | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object the proposal to inset Send Business Park from the Green Belt because of the increased traffic this will cause and the removal of the openness of the River Wey corridor which is exceptional at this part of the river valley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp17q/279 | Respondent: | 10773825 / Pierre Foskett | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a whole the 2017 plan fails to follow NFFP para 17 core planning principals and does not ‘contribute to conserving and enhancing the natural environment and reducing pollution’. There are fundamental errors made in requirements for housing and employment based on the source documents e.g. SHMA and ELNA. The data sources do not show empirical evidence for the changes in the UK’s housing and economic status after it leaves then European Union. The UK population has voted to make a significant change to the country’s economy and population and the impact of Brexit on the local area must be accurately evaluated or else the entire basis of the local plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2755  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2756  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5724  **Respondent:** 10774145 / P Jordan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe
constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5726  **Respondent:** 10774145 / P Jordan  **Agent:** 10774145

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down...
the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11546  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11562  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and
it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11541  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11543  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11560  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11548  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause...
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11551  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11554  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11538  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11537  Respondent: 10774145 / P Jordan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/19  Respondent: 10774817 / Jack Aboe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal on the grounds that the addition of such a large number of house would significantly effect the quality of life in both Ripley and Send. The major increase in traffic alone makes this proposal unviable. The question of Primary and Secondary schooling is relevant, are new Schools proposed? also the access to Medical Services is worrying given that the Send Medical centre is working at full stretch already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/18  Respondent: 10774817 / Jack Aboe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this proposal on the grounds that it will significantly increase the traffic flow through Send village which, at rush hour times, is already significant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/20  Respondent: 10774817 / Jack Aboe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal.

The two roads that would access this site, namely SendHill and Potters Lane are not suitable for increased traffic.

With the other proposed development (A43) The Schools nor the local services would be able to cope.

Send is a village not a suburb of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1626  Respondent: 10774817 / Jack Aboe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase of housing on this site primarily due to the poor road access to the site and the likely increase of traffic through Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/194  Respondent: 10774881 / Kate Cheyne  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see documented below my objections to the final draft local plan (consultation period 6 June to 18 July). Please ensure that my comments are referred to the Inspector.

I object to the lack of evidence supporting future housing needs (which need further review in light of Brexit)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Document:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Needs assessment:

I questioned the scale of housing demand on which the revised draft local plan was based when first published. With the recent decision to leave the EU, and better control over immigration being a key argument in favour of this, I cannot see how the current demand forecasts are remotely reliable. I trust the study will need to be revised in light of the Brexit decision.

Evidence base and Infrastructure:

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows c. 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. I simply cannot see why industrial space is needed at Burnt Common. With the proximity of the housing and industrial sites to the motorway, I expect that these will not serve the local community but rather be suited to those commuting in (to work) and out (if housed) of Send. This does not fit the objectives of providing housing for future requirements of the local community.

I want to point out that the GBC’s Transport Assessment was not available to Councillors for the vote taken on 24 May 2016, being published on 6 June. The plan does not have enough consideration for infrastructure overload. The road network in the Send area, particularly Send Marsh Road and the A247 linking Portsmouth Road and the A3 to Woking cannot handle any more that it already does. It is impossible at the moment particularly during peak times. The proposal of a 4 way interchange onto the A3 would mean that the roads through Send Marsh and Send would become the main link between the A3 and Woking, completely changing the village into a thoroughfare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific objections to Policy A43 and A43a: Garlick’s Arch / Burnt Common / North Facing Slip Roads:

The proposal is for 400 houses and 7,000 sq m of industrial and warehousing space. I object to this proposal on the basis of the following:

- This site has appeared very recently, it was not included in the Regulation 18 Draft and has not previously been consulted upon
- It falls within green belt permanently protected by the NPPF which prevents merging of settlements
- The site is particularly sensitive from a conservation stand point, as it has ancient woodland with trees dating back to the 16th century
- This will add significant traffic to the local road infrastructure around Send and Send Marsh; these roads are already heavily over loaded, and there is no space to widen given the residential surrounds

No amount of expert studies can replace personal experience; I urge anyone considering these proposals to try and travel on the A247 road through Send at peak times to see how impossible it already is to travel between the A3 and Woking. The B368 through Send Marsh is used as an alternative when the A247 is overloaded, and this will become the next constraint. The surrounding proposed developments such as Gosden Hill Farm will without doubt also want to use the slip road and increase traffic through these already constrained and overloaded village roads.

- Services such as doctors are already overloaded in the Send / Send Marsh / Ripley area. It is close to impossible to get a doctor’s appointment within a 3 – 4 day window at the Villages Medical Practice as it stands with current population; where has this been considered, what is the plan to provide services to this significant addition of people?
- Flood risk: Over recent years the flooding in Send Marsh has become progressively worse with changing weather conditions. As example I quote winter of 2013 / 2014. Adding such as significant amount of development can only make this situation more severe.
- Nature of the village will be forever changed; Send and Send Marsh will no longer be rural villages given the scale of this development.

If there is a need for more industrial space (which I still question particularly in light of Brexit), then why would this not be an extension of the existing Slyfield Industrial Estate?

I trust my objections will be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the lack of plans for provision of services eg. doctors, schools

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to any “in setting” of villages from the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Specific objections to Policy P2: Proposed Removal of Send from the Green Belt**

Send provides a buffer between Woking and Guildford. This is sensitive land on the banks of the Wey River, and I cannot see how it can be permitted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the disproportionate amount of development in one area of the Borough</td>
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<td>I object to the limited consultation period</td>
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<td>I object to the late inclusion of new sites (eg. Garlick’s Arch)</td>
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<td>Since 2014, GBC have changed major sites in Send proposed for development, and now a significant new road junction has been added. The 2014 proposal for 430 new houses went down in April 2016, then recently up again to 485. These significant changes require consultation under Regulation 18, which to date I’m not aware of having happened.</td>
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<th>Comment ID: pslp173/184</th>
<th>Respondent: 10774881 / Kate Cheyne</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:

1. This is an area with prolific birds and wildlife
2. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
3. There is highly restricted vehicular access along Tannery Lane in both directions
4. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(1) I object to the Policy A42 change at Clockbarn in Tannery Lane because:

The latest draft plan proposes 60 homes in place of 45 homes is 33% more than previously proposed. This shows a completed disregard for the previous comments and objections of the community.

Now more homes than previously proposed means all impacts previously stated will be greater, including:

1. This is an area with prolific birds and wildlife
2. Future access and traffic problems in Tannery Lane and at the A247 junction
3. Erosion of the Green Belt in our village
4. Surface water flooding, which is already a problem, will become even worse
5. It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1729</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2) I object to the Policy A43 change at Garlick’s Arch because:

This again is an increase in number of houses and now inclusion of 6 Travelling Showpeople plots.

1. This is an area with prolific birds and wildlife
2. There is no proven demand for Travelling Showpeople plots in this location
3. It is beautiful permanent Green Belt and no “exceptional circumstances” have been stated or proven
4. Separation of villages is a key objective of the green belt. This development will join up Ripley and Send and defeat the key purpose of Green Belt
5. It is subject to frequent flooding and is currently a flood zone 2 allocation; I personally experienced this during heavy rains on recent years where the entire area is left flooded for days afterward
6. It will generate excessive traffic in an area that is already struggling to cope with the volume of cars on the road

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1763  Respondent: 10774881 / Kate Cheyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(3) I object to Policy A 58 at Burnt Common because:

This proposal was previously deleted from the 2014 draft as a result of the objections. I’m unclear as to why these have now been ignored. I object to these changes in the latest draft local plan on the basis that:

1. This is an area with prolific birds and wildlife
2. There is no need to build industrial or warehouse development in the middle of the Green Belt when only a few miles away Slyfield and Guildford are under utilised (they still have empty sites and industrial units)

1. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough. The proposal is out of kilter with this demand.
2. The impact on small surrounding roads will create more traffic problems in an area already struggling
3. It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5654  Respondent: 10775041 / Keith Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find attached my comments on the Guildford Borough Council Proposed Local Plan. I know this is a standard draft letter but it does summarise well my views on the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1336  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Guildford Borough Council not taking evidence into account when producing the current plan.

The Employment Lands Needs Assessment 2015 (ELNA) shows an 80% reduction in employment space from the previous ELNA of 2013. This surely indicates that there is no need for any further industrial space in Send Village. I object to plans for further unneeded industrial development in Send Village.

I have concerns over the assessment of housing need in Guildford. If the population of Guildford is to grow by 20,000 in the planned period this would require 800 new homes, based on the average 2.5 persons per home. How can you justify a need for 13,500 homes while using foreign students to inflate the figure in The Strategic Housing Market Assessment 2015?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1335  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am absolutely appalled and wish to **object in the strongest terms** to the latest plans by Guildford Borough Council for future development in Send Village.

Firstly, as a resident of Send Village, I object to Guildford Borough Council not following the correct process of consultation with Send residents.

In April 2016 the hugely excessive 2014 plan to build 430 houses in Send had been reduced to 185, which was a much more realistic figure in relation to the size of the village. The new plan is now for 485 new houses which is more than twice as many as recommended in the April plan. This should surely trigger full consultation under Regulation 18, as it will have such an impact on the village, rather than Regulation 19 which Guildford Borough Council are trying to do.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Finally, I strongly **object** to the cynical manner in which Guildford Borough Council has added unnecessary housing and industrial proposals to our Local Plan. I find it difficult to believe that it is legal for the development of a large road junction with such huge impact to the surrounding area to be shoehorned into this plan without proper consultation. I also strongly **object** to Guildford Borough Council ignoring Government advice that Green Belt land must remain protected except in exceptional need, which does not exist in this local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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</table>
With regards to Policy A 43, I object to the fact that this new site at Garlick's Arch was not included in the Regulation 18 draft and so has not been consulted on previously. This is, surely, wrong. How can you justify this?

I object to the proposed development of land at Garlick's Arch for housing and industrial use. We actually need 800 new homes in Guildford although Guildford Borough Council have suggested an outrageous figure of 13,860. There is no need whatsoever to develop Green Belt land, which includes significantly important woodland, to build yet another 400 homes.

I object to the proposal for 7,000 square metres of industrial use and warehousing at Garlick's Arch. It is simply not required, as the ELNA 2015 shows an 80% reduction in employment floor space since the previous assessment. If there is a need in Guildford there are previously approved plans for industrial use at Slyfield where existing infrastructure can support the development. If the Garlick's Arch development went ahead this would include a new 4-way junction with the A3 at Burnt Common that Send Village simply couldn't cope with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2395  Respondent: 10775137 / Wendy Lodge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to plans for a 4-way interchange at Burnt Common for several reasons. There is no need to build over Green Belt land to provide this interchange. If this junction was developed it would result in a huge increase in traffic through Send on the A247. The road is already struggling with traffic at peak times and this is only going to get worse when the new schools open in Send Barns Lane. Increased traffic through the village will probably result in calls by groups to restrict parking to allow traffic flow, further impinging on residents of Send and detrimental to local businesses. As a resident living on the A247, I object in the strongest terms to this development which would make our lives intolerable and if the 2,000 houses proposed for both Wisley and Burpham go ahead it will only increase traffic further.

I object to this proposal as Government guidance to planners was that Green Belt should only be built on if there are exceptional circumstances requiring this to happen. There are no exceptional circumstances at Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2396  Respondent: 10775137 / Wendy Lodge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Regarding Policy A44, I object to the plan to develop land west of Winds Ridge and Send Hill. Again, this is a new site and has such was not included in the Regulation 18 draft and has not been properly consulted upon previously.

I object to this development of protected Green Belt Land and the impact it would have on our wildlife, including the habitat of some listed birds in the area. This development would have a serious impact on the landscape of Send Hill and Potters Lane.

I object to the plan for two Traveller Pitches on this site. There is no need for any further Pitches in the Borough. The land on this site is old landfill with documented hazardous waste. Government guidance to planners was that Green Belt should only be built on if there are exceptional circumstances requiring this to happen. There are no exceptional circumstances at Send Hill. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5313  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also find it surprising that Guildford Borough Council are prepared to make such far reaching decisions when they did not have their own Transport Assessment to guide them. It suggests they want their plan to go through, no matter the consequences to the residents of Send Village. The infrastructure of Send and Ripley will not cope with such a high increase in population as envisaged under these new plans. I fear for the future of the children in our village. Have you even considered how they will all be educated? As for health care, I know as both a patient, but also a former employee of our GP surgery, that this facility could not cope with this huge increase in patients.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5312  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Surely you must be aware that there is enough brown field land in Guildford to build half of the required 800 new homes. I, therefore, strongly **object** to Guildford Borough Council planning to take the villages of Send and Ripley out of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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With regards to Policy P2, I object in the strongest terms to any suggestion that Send and Ripley are to be removed from the Green Belt. This essential protection stops uncontrolled development filling in the green spaces between settlements. The whole nature of Guildford and its surroundings is a county town surrounded by villages and green spaces for residents and visitors to enjoy. It has been proved that people require green areas for their physical and emotional well-being, with large cities, including London, retaining their large green spaces.

However, you believe it is reasonable to reduce ours. The actions of the Guildford Borough Council have already shown how important it is for Send to remain under the protection afforded by Green Belt legislation. The Wey Navigation is used by thousands of people in boats, on cycles and walking the countryside in this area, which would be detrimentally affected by further building on the land along the canal. There would be significant pressure to do so if protection was removed and, as shown by the approval of plans for a new marina in Tannery Lane, Guildford Borough Council cannot be trusted to follow the wishes of the residents of Send Village. Land in surrounding boroughs is also facing threats of removal from Green Belt protection. There must be a whole landscape approach to development. Current proposals are threatening to cover this part of Surrey with concrete. Guildford Borough Council have made repeated promises to protect the Green Belt but have failed to deliver on them. Taking Send Village out of the Green Belt would put huge pressure on the green spaces within the village for unwanted and unnecessary development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
I object to Policy A42, Clockbarn Nursery, Tannery Lane.

This policy INCREASES previous proposals by a third from 45 to 60 homes. This is far too many. Tannery Lane is very narrow and the junction with Send Road is busy. this proposal will only make that worse.

Thousands of people use the Wey Navigation and its towpath recreationally every year. They do so to enjoy the countryside and views along the canal. This proposal will seriously affect the canal between the Broadmead Bridge and Tannery bridge, already built up on too much on the Send bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2406  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because:

It ignores all the thousands of previous objections made by local people

There is no proven demand for Travelling Showpeople plots in this location and Guildford has more than enough traveller plots.

It is beautiful permanent Green Belt and no "exceptional circumstances" exist to allow development on it. Almost every week in the media Government Ministers state that the Green Belt must be protected and only developed where overarching need is proved and yet Guildford Borough Council seem determined to destroy this area of ancient woodland that existed at the time of Elizabeth 1.

It will cause over-development of our village and the number of homes is excessive. It will join up Ripley and Send and defeat the key purpose of Green Belt. It is subject to frequent flooding and is currently a flood zone 2 allocation. It is contaminated by lead shot accumulated over fifty years. It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2405  Respondent: 10775137 / Wendy Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Burnt Common, London Road

It was deleted from the 2014 draft because of all the objections made previously

There is already land at Slyfield that was planned to take further industry but this has been ignored. Send is a village, separated from Ripley and Send Marsh by narrow but important areas of green belt and will lose all character if these are built over. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The impact on small surrounding roads will create traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/802  Respondent: 10775137 / Wendy Lodge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal Policy2 at paragraph 4.3.15, to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I object to the insetting of other land within Send. Already developers are looking at building on the School playing fields which, it is proposed, will be removed from green belt protection. They have even asked me my thoughts on selling them part of my garden! This is in addition to all the other proposed building and extra houses recently, currently under review and proposed on residential plots. This is all too much for the small village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.</td>
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<td>Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.</td>
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<td>Expansion should be constrained to protect the character of town and country in our already congested town.</td>
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<td>It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.</td>
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<tr>
<td>Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.</td>
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<td>Respondent: 10775169 / Caroline Grafton</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>Please accept this email as my objection to the Local Plan. I objected to the last plan and GBC seem to have again ignored what the local people think and I fully support the Guildford residents Association response and oppose Guildford expanding by a quarter.</td>
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<td>Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>Directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a] adds to air pollution in neighbouring areas, which already exceeds safe EU limits.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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I am writing to object as strongly as I can to the draft Guildford local plan currently out for consultation. It is with some dismay to note that Three Farms Meadows at Ockham, is still included in the new plan for development of up to 2000 plus houses and an industrial estate.

It seems quite extraordinary that having been unanimously objected to by Guildford Borough Council Planners, it is still being considered as appropriate.

The reasons given for the refusal of the Planning Application have not been mitigated to any degree whatsoever and how, in such a short space of time, the Guildford Borough Planners and Politicians can change their minds so completely, is beyond belief.

The reasons for objecting, certainly to that part of the Local Plan as well as many other proposals, are well rehearsed and well understood by the Planners and local Politicians. Green Belt should always be safeguarded as much as possible, which is of course, specifically dealt with in all Government guidelines relating to such things currently in play.

If the local plan proceeds to be issued in its current form, Guildford Borough Council, in particular the Planning Department and the Councillors who support the Draft, will lose all credibility, if any still exists.

I trust my objection will be treated, along with the hundreds of others that I am sure will be received, in such a way as to show the Council that it is time they started to listen to those whom they serve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object as strongly as I can to the draft Guildford local plan currently out for consultation. It is with some dismay to note that Three Farms Meadows at Ockham, is still included in the new plan for development of up to 2000 plus houses and an industrial estate.

It seems quite extraordinary that having been unanimously objected to by Guildford Borough Council Planners, it is still being considered as appropriate.

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The reasons for objecting, certainly to that part of the Local Plan as well as many other proposals, are well rehearsed and well understood by the Planners and local Politicians. Green Belt should always be safeguarded as much as possible, which is of course, specifically dealt with in all Government guidelines relating to such things currently in play.

If the local plan proceeds to be issued in its current form, Guildford Borough Council, in particular the Planning Department and the Councillors who support the Draft, will lose all credibility, if any still exists.

I would also like to add that the volume of traffic surrounding the M25/A3 junction and the A3 southbound to Guildford and northbound to London, is proving to be a nightmare for local villages and residents and access on and off the A3, not to mention the noise, pollution and danger.

There are more and more accidents every day and it is becoming a very dangerous area to drive. The local lanes around Ockham, Ripley, The Horsleys, Effingham, Bookham etc are struggling to cope with the traffic today and they are not wide enough for cyclists and cars now, so goodness knows how it will be if we have even more housing and businesses in this area. The A3 will become a static car park, like the M25 in this area, particularly at Junction 10 which is already congested eastbound and westbound at present.

I trust my objection will be treated, along with the hundreds of others that I am sure will be received, in such a way as to show the Council that it is time they started to listen to those whom they serve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/661</th>
<th>Respondent: 10776033 / Prue Robinson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the exaggerated &quot;housing need&quot; figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and I particularly to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances. In fact that area of Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transports hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In fact I object to all the proposed sites in Send because, not least because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. We were promised there would be no major changes made to the 2016 draft plan by the Leader of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/1056</th>
<th>Respondent: 10776033 / Prue Robinson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope. The local school cannot take any more pupils. The local doctors' surgery cannot take any more patients.

I vehemently object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I ask that you please take note of the deep concerns of a huge number of Send residents and indeed many others who are connected to the village, pass through it on a daily basis and use this area for recreational purposes.

Please would you acknowledge receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/1055</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to building 45 houses at Clockham because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. It is a country LANE. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1054  Respondent: 10776033 / Prue Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick's Arch for 400 houses, which was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation. This has been quite disgraceful. Also this proposed development is simply not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick's Arch because the site has particular conservation sensitivity since it is covered in ancient woodland. Trees which have existed since the 16th century would be endangered. The site is attractive open countryside and part of the permanent Green Belt, with is protected under the National Policy Framework. It also represents an unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging towns and settlements. Oh yes, and the site is also subject to flooding!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1053  Respondent: 10776033 / Prue Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. This would be disastrous for Send and the A247 would be gridlocked all day; just please visit this area during any of the rush hours to understand the significant weight of traffic that already uses the A247 and the minor surrounding roads. The knock on effect up to the small roundabout at Old Woking (where the B382 joins it) will be a really serious problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42
I object most strongly to the changes made to Policy A42
These are my reasons:
I note that the changes you have made actually increase the number of homes from 45 to 60 - a 33% rise which is too much. This ignores all the hundreds of previous objections made by local people - I cannot understand why you have done this. The access and traffic problems that already exist in Tannery Lane and at the A247 junction will worsen that is for sure. Erosion of the Green Belt in our village will become worse along with the surface water flooding, which is already a serious problem. The countryside views from the River Wey Navigation that are enjoyed by so many will be spoiled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Garlick's Arch, Send Marsh, Policy A43
I object most strongly to the changes made to Policy A43
These are my reasons:
It appears from the changes you have made to the proposal for homes and Travelling Showpeople plots that you have totally ignored the tens of thousands of pernicious objections made by local people. What exactly are the 'exceptional circumstances' you claim exist? Please would you clearly define these? Six Travelling Showpeople plots is excessive and unprecedented especially as there is no proven demand for any whatsoever in this location. Garlick's Arch is a permanent and lovely Green Belt piece of ancient woodland that has existed since the 16th century. Apart from the loss of this unique area of woodland and the fact the Ripley and Send will effectively be joined and therefore defeat the key purpose of Green Belt, this area is subject to frequent flooding and has been given a 'flood zone 2' allocation. Added to this high risk of flooding there is accumulated lead shot in this particular area and it is therefore contaminated. The revised plan for 400 homes will cause an immense over-development of our village - this number of new homes is excessive. Will our doctors' surgeries be able to cope with the demand from the proposed number of new residents or the local schools be able to offer places for the children? Very importantly, the additional traffic that your proposed plans/amended plans would generate would be excessive. There are noticeable rush hours here with to the M25 - I am sure plan would cause heavy roads in the area at least stationary traffic and queues that stretch from Old Woking you must be aware of this current situation. Your changed traffic for many hours each day and totally gridlock all the twice daily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Land at Burnt Common, London Road, Policy A58
I object most strongly to the changes made to Policy A58
These are my reasons:
This Policy A58 was in fact deleted from the 2014 draft because of the number of objections and I see that since then you not only reinstated the plan in 2016, despite a decline in demand for industrial land and have also replaced the word 'maximum' with 'minimum'. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough. The industrial and warehouse areas at Slyfield and Guildford have empty sites and industrial units so your immense over allocation of 10 hectares at Send, in Green Belt is incomprehensible to me. I do not understand why this is needed especially as the impact on the narrow surrounding roads already crowded with tail backs in rush hour periods and would most certainly become gridlocked. Creating one mass of clogged roads and over development will completely defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Green Belt, Policy 2 at paragraph 4.3.15
I object most strongly to the changes made to Green Belt, Policy 2 at paragraph 4.3.15
These are my reasons:
I note that Send Business Park is now taken out of the Green Belt altogether. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion and/or development here detracts from the openness of the Green Belt. It is inappropriate. To me your proposals to build on Green Belt in the Send area are completely unacceptable. In fact it appears that GBC have not only not listened to the tens of thousands of locals' objections and points of view but are set on making life worse for us all! To accommodate all that you would like to do there is certainly an inadequate infrastructure i.e. schools, medical facilities (as required by law) and our already crowded roads which will not be able to cope. And this is aside from the planned decimation of ancient woodland and beautiful countryside enjoyed by so many. To sum up, I find the changes in your proposals completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/593  Respondent: 10776225 / Roger Main  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites

I OBJECT. The NPPF states that most development in the Green Belt is inappropriate. Planning guidance issued in March 2014 states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt enough to constitute “exceptional circumstances”. There is therefore no justification for removing the Horsleys and other villages from the Green Belt and building housing on Green Belt land.

The number of houses proposed for East and West Horsley (533 in total) is disproportionate to the present sizes of the villages. The houses would be at a much greater density than the present houses – for example, the Planning Officer’s report for a road in East Horsley describes it as “[a] semi-rural residential area comprising a series of essentially two storey medium to large properties on medium to large plots. The properties are generally set away from the boundary lines”. Any new development of the numbers and areas proposed would inevitably be quite different and would destroy the special character of the villages.

Problems with lack of infrastructure have already been described above (Policy I1). Schools are already full, the Medical Centre is full, mains water pressure is low, foul drainage is inadequate (I could go on). Parts of East and West Horsley are subject to flooding on a regular basis, and at least one site (A40 – Waterloo Farm) has been proposed on a flood-prone area.
Ockham Road North, which would be the means of access to site A40 (and is also one of the main routes from the Wisley Airfield site – A35) is narrow, winding and dangerous. Cyclists are at risk from the heavy goods traffic and during the winter the road has been closed due to flooding. It is also subject to ice. The pavement is on one side of the road (but changes from side to side – an additional hazard for pedestrians).

There are brownfield sites within a short distance of Guildford town centre which would be just as suitable for housing. An application to build flats in Walnut Tree Close was refused because of potential flooding problems although it is difficult to see why if building on a flood plain in Horsley is acceptable, building in Walnut Tree Close is not.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/873  **Respondent:** 10776225 / Roger Main  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy A35 – Land at former Wisley airfield, Ockham**

I OBJECT. GBC recently rejected a planning application for this site, so it is extraordinary that they should continue to include it in the Local Plan.

I originally wrote this objection in January 2015. Nothing has changed.

Wisley Airfield is in the Green Belt and has lain largely undisturbed for well over thirty years. It is scarcely a brown-field site and there are no “exceptional circumstances” which would outweigh the harm to the Green Belt were development to go ahead. The site is adjacent to the world-famous Wisley RHS Gardens and to the SPA at Chatley Heath. Destroying a special site and “replacing” it with land elsewhere would be detrimental for the environment, nature and wildlife. The land available at Wisley airfield is not sufficient for the number of houses proposed and there is no prospect of acquiring more. The local roads are not able to cope with the increase in traffic which would result from the development. The main road through East Horsley towards Ockham and Wisley Airfield is Ockham Road South (B2039) which already takes a significant volume of heavy goods traffic. The road is not wide enough for two large commercial vehicles to pass without one ending up on the pavement. Additional traffic caused by development will only make matters worse. The road is dangerous for cyclists – because it is narrow and because it is not maintained adequately, given the volume and weight of traffic it has to handle. Sewerage services, water, gas and electricity supplies are already severely stretched and suffer frequent breakdowns. They cannot cope with significant additional housing. The A3 interchange is uni-directional, allowing traffic to go to and from London and the M25. There is no access to or from the Guildford direction, so traffic will have to go through the centre of Ripley village. The junction of the A3 and M25 already fails to meet European standards on air pollution. Additional housing will only make it worse. The junction of Ockham Road North and the A3 at Ripley, close to the proposed site, is regularly flooded and – not for the first time – was closed for several days last year. Another attempt at drainage work is under way at the moment – there is no reason it will be any more successful in the long term than its predecessors. There is no adequate plan for public transport to the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy D2 – Sustainable design, construction and energy

I OBJECT. I agree with the definitions of sustainability and I am passionate about the issues. We ourselves have installed photovoltaic cells, rainwater harvesting for use in the house and a ground-source heat pump. The Local Plan seems to be paying lip service to the need for sustainability, but the council’s track record on delivery is woeful.

The traffic resulting from the vast increases in housing will result in more cars on the already congested roads of our villages, increasing pollution levels, noise and damage to the environment.

The references to CCHP appear to have been cut and pasted from the document “Model policies for energy in neighbourhood plans” (https://www.regensw.co.uk/communities/wp-content/uploads/sites/5/2016/05/Energy-in-Neighbourhood-Planning-model-policies-with-context.pdf). Of course, GBC are using it for the Local Plan rather than a Neighbourhood Plan. The Local Plan omits the final section of the document: “Before energy policies are developed for a neighbourhood plan, a clear objective on energy for the NP needs to be established following consultation with the community. Appropriate policies for the area can then be developed through an evidence base gathering and consultation process. These policies need to be reviewed together to ensure that they form a cohesive whole – reinforcing, rather than contradicting each other.”

Should this not have happened already if it is to be such an integral part of the plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1784  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 – District Centres

I OBJECT. In the previous (2014) Local Plan, District Centres were defined as follows: “[They] have at least 30 commercial units, including a large supermarket and local services such as a bank, and are accessible by public transport. [They] function as district centres because of their number and range of commercial and community uses and their accessibility by public transport.”

- There is no bank in Ripley, and only one in East Horsley.
- East Horsley (Station Parade) has 25 units, many of which are services (library, bank, hairdressers, cafes and take-aways), not retail units. The number rises to 30 only if all the units between Station Parade and the station (Station Approach) are included.
- There is no “large supermarket” in East Horsley or in Ripley. Budgens in East Horsley is small enough not to come under the Sunday trading laws.
- Horsley is served by train from Guildford (4 per hour), Leatherhead and Epsom (2 per hour each), all of which do have large supermarkets accessible from their railway stations. The 478 bus service to the East Horsley village consists of three or four buses per day in each direction (0939,1139,1349,1709 to Leatherhead and 1042,1242,1502 [school holidays only] to Guildford) which run on Mondays to Fridays only. It is very unlikely that shoppers will come by train to shop at a convenience store in Horsley. The 478 is used to travel to Tesco at Leatherhead precisely because there is no large supermarket in Horsley.
- Ripley has no railway station (the nearest one is Clandon, some 3 miles away). It does have bus services (515 about every 75 minutes to Guildford or Kingston, 462 or 463 about every hour to Guildford or Woking).

The only reason to designate these villages as District Centres seems to be to make it easier to approve planning permission for additional development adjacent to the shops. The fact that there are empty shops indicates that there is insufficient demand for the status quo. Providing viable additional shopping facilities will require a large influx of shoppers, which the infrastructure is quite unable to support. Furthermore, in East Horsley, there is no space to expand the shopping area nor to provide the inevitable parking requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1785  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 – Rural Centres

I OBJECT. The same reasoning applies as for District Centres – there is no local demand for additional shopping facilities and the infrastructure cannot cope with increased numbers from outside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/1780</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 – Homes For All

I OBJECT. The proportions proposed in 4.2.3 are based on the same mysterious model used to project the housing demand. There is no transparency in where the numbers come from.

The University of Surrey gets off far too lightly. It has vast areas of surface car parking which could – and should – be used for housing, with parking space either below the housing or in adjoining multi-storey car parks. There is no need for it to build on greenfield sites and it would immediately reduce the alleged housing demand in the borough by a significant proportion. There is already planning permission for a large amount of student accommodation which has not been built, yet the University wants to expand the area of its campus even further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy H2 – Affordable Homes**

I OBJECT. Under the usual definition of “affordable” (rented at 80% of market rates), houses in much of the borough – and certainly in the Horsleys – would be unaffordable to anyone on the living wage, even if they did not need to travel, be warm or be fed. The belief that new homes will be “affordable” (to rent or buy) is simply wishful thinking.

The best way to reduce people’s travel times is that they should live fairly close to where they work, and to have good public transport to move them around. This is an excellent opportunity to build in Guildford town centre and its immediate neighbourhood – small flats would be highly sought-after.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/1787</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy I1 – Infrastructure and Delivery**

I OBJECT. The infrastructure in the borough – roads, water, sewerage, schools, medical services – is already stretched. There appears to be no plan for providing the necessary infrastructure so that it is ready for the demands which would be placed upon it were the plan ever to be implemented.

Many of the sites – particularly in the villages – are effectively on greenfield sites, with no existing infrastructure. GBC must know that adding infrastructure is not simply a matter of digging a hole and connecting to an existing service. A whole range of services will need massive upgrading to cope with the increased demand, but there is no indication of how this is going to happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/1788</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy I2 – Supporting the Department for Transport’s “Road Investment Strategy”

I OBJECT. Road investment plans have a habit of being delayed or cancelled, particularly when projected costs begin to spiral. The two proposals in Road Period 1 (widening of the M25 and improvements to the M25/A3 junction) will probably increase traffic on the A3 and make matters worse around Guildford. The proposal in Road Period 2 for a tunnel under Guildford will never be more than a pipe-dream.

Nevertheless, the Local Plan proposes to build the new housing before these road improvements have been carried out. The lack of completed infrastructure must put severe constraints on what could actually be built, but the Local Plan fails to address this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1789  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3 – Sustainable transport for new developments

I OBJECT. It is wishful thinking to imagine that many people will cycle from their new homes to the railway station. Most commuters will not wish to be wet, muddy and cold when they start or finish work and they will not be able to take much with them, for safety reasons. The roads are narrow, congested, poorly lit and poorly maintained, and are a hazard for cyclists. Shoppers will not cycle to the supermarket (how would they carry their shopping home? – or will they have it delivered, so adding to the traffic). The elderly would be unwise to cycle if they are at all unsteady or slow to react. Use of tricycles instead is hazardous – they are wider and less manoeuvrable.

Plans for a new railway station at Merrow (“Guildford East”) have been put forward and rejected many times in the past; there is no reason to suppose that it will be any different this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1782  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2 – Green Belt

I OBJECT. The (Metropolitan) Green Belt is not for GBC or any others to play with. There is no justification for inserting East or West Horsley. They are currently washed over by the Green Belt and their character adds to the character and ambience of the Green Belt as required under NPPF guidelines. There is no justification for going even further and then taking additional land adjacent to the villages out of the Green Belt, to allow for more housing development.

The argument that adding “Green Belt” in Tongham and Ash (on the other side of Guildford, away from London) makes up for the loss of other villages is specious. The Metropolitan Green Belt is intended to prevent urban sprawl from London and allow for green space around it – Tongham and Ash are outside the Green Belt because they would make no difference to it. It may just be coincidence that these wards were represented by present and past leaders of the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1779  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTIONS TO THE LOCAL PLAN

Policy S2 – Borough-wide Strategy

I OBJECT. There is no supporting evidence for the proposed number of homes (13,860). The assumptions used in the modelling are not given. It may be – as the Director of Development at GBC implies – that the Council does not know what the assumptions are. They are failing in their duty if they do not know. The data – again according to the Director of Development – is widely available, but the Council will not provide it, nor say what it is nor where it came from. There is a complete lack of transparency in the whole process.

It is unclear what the figure of 13,860 represents. The plan says it is the total number of new houses to be delivered by 2033. We do not know what numbers the model actually produced. We do not know why the plan does not take into account the routine small-scale developments and re-developments that already take place all the time within the borough.

The Director of Development wrote to the Surrey Advertiser trying to draw a distinction between the Objectively Assessed Need and the number actually achievable. It is unclear which numbers are being used in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/137  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the revision of settlement boundaries and the removal of East Horsley from the Green Belt. East and West Horsley are currently washed over by the Green Belt and their character adds to the character and ambience of the Green Belt as required under NPPF guidelines. The NPPF states that most development in the Green Belt is inappropriate. Planning guidance issued in March 2014 states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt enough to constitute “exceptional circumstances”. There is therefore no justification for removing the Horsleys and other villages from the Green Belt and building housing on Green Belt land.

I OBJECT to the proposal to build approximately 100 new homes on land prone to flooding near Horsley Station and to the development proposals to build over 2000 homes on the former Wisley Airfield site. The removal of sites A41 and A36 may reduce the level of housing proposed for East and West Horsley, but it still leaves too much housing of an inappropriate character in an area with inadequate infrastructure to cope with increases in traffic, demands for utilities and for medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/364  Respondent: 10776225 / Roger Main  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the (revised) proposed increase in housing stock. Government predictions are for approximately 10% growth in population, which in any case could change substantially depending on the terms of Britain’s exit from the EU. Student accommodation, if required, should be provided by the University of Surrey on its existing sites. Large areas of land, originally designated for accommodation, are at present used to provide surface car parking. The land should be utilised much more efficiently – using multi-storey car parks or building above ground floor parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6069  Respondent: 10778849 / Jonathan Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of Wisley Airfield and Garlick's Arch as sites of immense natural beauty. Their destruction would be criminal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12433</th>
<th>Respondent: 10778849 / Jonathan Cooper</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historical character of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/12432</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to erosion of the Green Belt in these areas as another example of environmental criminality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/12435 | Respondent: 10778849 / Jonathan Cooper | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the staggering behaviour of a council which, completely out of character, suddenly proposes vast developments of an unprecedented scale with very poor justification which seems to mainly involve profit and individual gain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing regarding the fields behind Shalford village hall, and its status within the new local plan.

I note that the land has still not been returned to its former AGLV status and is still included within the village’s settlement boundary. I would like to object to this in the strongest terms.

I am gratified that the land has now been designated as open space, because at least that is a recognition from the council of how important the area is to the life of the village.

As the fields adjoin the tennis club, bowling green and a public footpath, it gives the village an open character and is a huge contribution to the quality of life of the inhabitants. It is no wonder that a covenant had been placed on the field in the past, to try and ensure the landscape of the village is preserved for future generation (a covenant that was lifted in dubious legal circumstances).

However, even though open space sounds nice, I am very aware that ‘open space’ has no definition in law at this stage, so there is no guarantee that this designation cannot be circumvented by a persistent developer. It is a fig leaf that gives no protection to the land in law.

This unease is compounded as the GBC still insist on placing it within the settlement area of the village, despite all the protests thus far. This, I understand, could strip it of its green belt/AGLV status and make is much easier for a developer to propose building on it.

When it was first proposed that his land be placed within the settlement boundary, a petition was given to the council protesting the move. Some 715 signatures were collected from the people of Shalford, which showed the strength of feeling within the community towards the preservation of the land. It seems that the strength of feeling and strength of numbers carries little weight.
There is little need to allow this land to be developed, only the intention of the current landowner and the development company he is in partnership with to make money. The land itself is on the highest point of the village, and would ruin the landscape surrounding it, and would be seen from the whole village. Also, the only access to this site is a narrow track leading out into an already congested road with no pavements. An increase in traffic would surely jeopardise the welfare of families and children who have to walk along the road to get to the local school and the bus and train stations.

To reiterate, there are any number of sites within Shalford that are suitable for development and are being developed. The only reason that this beautiful area of Shalford is the greed of the local landowner who bought the land for next to nothing (as it was protected by covenant at the time) and now wishes to make a lot of money out it.

I hope that this state of affairs can be rectified to the satisfaction of the people of this village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2469  **Respondent:** 10780929 / Naren Nanda  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2470  **Respondent:** 10780929 / Naren Nanda  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through lurpham which is grid-locked every

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4962   Respondent: 10780929 / Naren Nanda   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper c onsultatien-in-relatlon to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could
accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10190  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10224  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural
residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value touri To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

2. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10214  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions., pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10254  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10198  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The wildlife in the garden have been around for years and are a delight to watch. Where will their food come from when their green spaces are concreted over over? I think my part of Normandy will consist of Worplesdon Road, Guildford Road, Bailes Lane and Guildford itself [text unreadable] us from the rest of the village! Smaller not 'greater' Normandy of the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1399  Respondent: 10780961 / Hillary Ingle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have not been told what the retail space will consist of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1401  Respondent: 10780961 / Hillary Ingle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A 60 bed nursing home. As an elderly person I would never willingly go into a home in what will be a built up area surrounded by 1,500 children and family houses with noisy cars, pets etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1397  **Respondent:** 10780961 / Hillary Ingle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The need for a secondary school is not necessary. Surrey is expanding its secondary schools. St Peters and County Ash Manor and Kings College are under subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1402  **Respondent:** 10780961 / Hillary Ingle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No provision has been made in the plan for the increased traffic that will be generated by these changes. With [text unreadable] expanding, huge volumes of commuter journeys from outside the borough could occur. The A323 will be overloaded. The pavements are narrow and uneven and on a windy day could easily blow a pedestrian into the road. Having lived in Normandy since 1963 I have noticed the increase in traffic noise already and it will only get worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/356  **Respondent:** 10780961 / Hillary Ingle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green belts, like the area at the back of Glaziers Lane, and Wanborough station, were designated to prevent urban sprawl. The DCLG suggest that once established green belt boundaries should be altered only in exceptional cases. The outcome of the proposals in this Local Plan will result in the amalgamation of Flexford with parts of Normandy with no green spaces in between. Is this not an exceptional case? Exceptional circumstances have to be demonstrated and it has to be approved by the inspectorate. There appears to be no legal evidence to back up the statement made that a school built on the green belt provides enough 'exceptional circumstance' to remove that land from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/196  Respondent: 10781505 / Donna Joyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly object to the council's proposal to build all along the A3 corridor. I find it incredible that these proposals have been put forward!!

The A3 itself is a major concern as it is already a very congested major road link often suffering from horrendous accidents most of those often occurring at the wisely interchange.

I don't need to mention the absurd pressures on our local services as I know this is a huge concern to many!!

I also feel that our wildlife is being vastly overlooked we cannot j deep plundering the green belt it is just not on!!!!

I wonder how much of this proposed development will be affordable???? I cannot afford to live in Ripley and I have been a homeowner for 24 years now.

So who will be buying these proposed properties or are they social housing????

I live in Send and We paid a fair price to live a semi rural life. We do not wish to be placed in a new town.

Look elsewhere for new housing not the A3 corridor.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: pslp172/296  Respondent: 10781505 / Donna Joyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
I am writing to you to voice my objection to the new revised local plan in my area, Policy A43 Garlicks Arch, Send Marsh.

I strongly object for the following reasons:

1. It seems that even though there was huge outcry from local residents the last time this was proposed the council have blatantly ignored the feelings of the locals here who already have to deal on a daily basis with increased traffic issues, noise and pollution.
2. The council both at local level and Surrey county council cannot maintain the roads that exist already there is an accident waiting to happen at the end of Send Marsh road at the junction with The old Portsmouth road this junction is always busy every morning with increased traffic from a new development this situation will be even worse than it is already.
3. Send Marsh is a little development in its own right! A new development will merge us with Send on one side and Ripley on the other. We will lose our identity.
4. Ancient woodland CANNOT EVER EVER BE REPLACED!!!
5. Travellers! There are plenty of sites up and down the country that can accommodate Travelling show people (if they actually still exist?). I see no reason for any Traveller plots to be made available, This to my mind is an excuse by the council to make provision for a Gypsy site.
6. I am sure that you hear on a daily basis about the squeeze on services, Well just to confirm if you need to see your GP it is true you do need to book your illness six weeks in advance,
7. I am also convinced that these homes will NOT BE AFFORDABLE TO THE AVERAGE PERSON! This is of course on Ripley's doorstep and we all know that it is more expensive than the average area with regard to property prices, Estate agents and builders will have a certain way of pushing up the prices.
8. Flooding in and around Ripley and all along The Send marsh road are a huge problem during spells of heavy and prolonged rainfall, I am quite sure that as with other developments throughout the years no thought or provision is made for our drain and sewer networks
9. All in All to go ahead with any of these proposals all up and down the A3 corridor would be a TOTAL DISASTER, not only for the already existing residents, but for wildlife, air quality, and general ease of life.
10. Send and Send Marsh and Ripley cannot take the extra strain and so I therefore ask that this objection be taken into account!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In summary I totally **OBJECT** to this and policy A58 Burnt Common, Industrial warehousing **REALLY????** and its right next door to Garlicks arch so basically an expansion of that, again it will cause gridlock on the morning commute then add in the almost daily accident on the already failing A3 and we who need to get to work may as well just simply go home.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I am also very much against the huge proposed development at Wisley Airfield – the impact on our villages would be enormous.</td>
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<td>And finally I object to the proposed development of Wisley Airfield. Before the war this was farmland and we were always promised by government that the land would be returned to agriculture. The impact on the Horsleys of 2000 houses plus retail and commercial development would be enormous and I consider all the above development is for developers to make a lot of money at the expense of local residents.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I question the necessity for all these extra houses. I am not against the development of the Bell and Colville site A37 if the houses are small and affordable as this will tidy up the area. But there is no need for anything larger than a 3 bed semi detached house, there are plenty of larger houses for sale in the local Estate Agents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Nearly 500 extra houses for East and West Horsley could result in a possible 1000 more cars on our narrow country roads, fighting for parking spaces at our shops, the station, the doctors and school areas. And if you query the figure of 1000 cars, I assure you that on the estate where I live almost every house has two cars in their drive, some have three.

No provision is made in the plan for extra school places [Raleigh is already full], extra medical facilities [our doctor’s surgery just copes at the moment but it is sometimes impossible to park there], improved public transport [4-5 buses a day through West Horsley at present] and if wanting to use the train service to London will people walk to the station, I doubt it!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4044  Respondent: 10781729 / Sylvia Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removing East and West Horsley from the Green Belt will completely change the character of the villages I know and love and I object most strongly to this proposal. I firmly believe the Green Belt needs to be preserved especially for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4049  Respondent: 10781729 / Sylvia Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do strongly object to removing East and West Horsley from the Green Belt as this will completely change the character of the villages. I believe the Green Belt needs to be preserved especially for future generations so they have a green and pleasant environment to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4042  Respondent: 10781729 / Sylvia Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to most of the proposals in the Guildford Plan on the following grounds:

Having lived in West Horsley for 60 years I know only too well the drainage problems we experience, in particular sites A41 and A38 alongside East Lane and site A40 at the bottom of my back garden and almost adjacent to the lake at the Camping Club’s site. ANY MORE CONCRETE will exacerbate the flooding we now experience at times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/747  Respondent: 10781729 / Sylvia Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I would question as well how the number of new houses necessary for our village was arrived as this is not revealed in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/523  Respondent: 10781889 / Nathanael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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As a resident of Normandy, I wholly support the withdrawal of Policies A46 and A47 (the former being the so-called ‘strategic site’ that would have added 1100 extra houses to the village, and the latter being a proposal to build on an SNCl), as these would inevitably have had a drastic effect in destroying the open and green character of our village. These proposals would have also placed a burden on our existing amenities of road and rail transport, for example: increased congestion at the already busy junction of the A31 with with Wanborough Hill/B3000, which is a nightmare at rush hour, with long queues and a frightening propensity for serious road traffic collisions; increased strain upon the limited car parking available at Wanborough Station, increased strain on the one ticket machine in operation at Wanborough Station, which often causes a long queue at peak times. Therefore, I am thankful the GBC has taken heed of the comments made by residents and the Parish Council in response to the previous version of the Local Plan, and taken Sites A46 and A47 out of this version of the Local Plan.
I also support the opening of a new rail station ‘Guildford West’, Site A59, to serve the Park Barn/Manor Park area, as I feel the extra traffic on the Ascot-Guildford South West Trains service this would cause would be justified by the resultant increase in sustainable mobility for residents of the West Guildford suburbs - who currently have little option other than a lengthy walk or to drive into the centre of town. The opening of such a station would also hopefully reduce the congestion around the A3 in the area of The Tesco Superstore/Royal Surrey County Hospital/Stag Hill/Guildford Business Park, where traffic often grinds to a standstill at peak times.

It is my view, in general, that the use of brownfield is sites a much better alternative to new development on Green Belt land. However, this is with proviso that such development should be first and foremost for residential ends, not commercial/retail purposes, as I feel it is of much greater importance to make Guildford a strong human community and a nice place to live, rather than a giant retail park where everyone has to drive into town on highly congested roads. Thus I support the regeneration of sites within Guildford proper (both in the Town Centre and the Urban Area), especially proposals such as sites A20 (community Hub), and A21 (allotments) because this will reinvigorate and enrich living spaces within the town, and provide housing and community amenities that are close to places of employment, thus reducing the strain on already very busy road and rail transport networks.

I would, however, also like to see the development in Guildford town accompanied by better provision of a sustainable transport network, particularly the development of safe cycle routes from the suburbs to the town centre, so as to get more people out of their cars and using less congestive forms of traffic, causing less emissions and promoting good public health. Therefore I support the proposal of Site A10, but would like to see even more plans for development in the field of sustainable transport/movement. This would tie in very well with the already established community endeavour The Guildford Bike Project, with its shop on Southway, which is already providing a much needed service of cheap and effective cycle sales and service, and only lacks a good network of cycle lanes for the residents of Westborough, and the rest of Guildford, to use said bicycles on.

Objections

I am pleased to see a reversion of the proposed Green Belt boundary changes, such that sites A46 and A47 will maintain their prior Green Belt status, and in acknowledgement of the key role these areas contribute to our village’s open character as well as the usefulness of this land for agricultural purposes. However, I am in agreement with the views of the Parish Council, and strongly object to the ‘insetting’ within Green Belt land of the three most settled areas of Normandy and Flexford. My objection has two key components: first, that no case has been made for grounds of ‘exceptional circumstances’ upon which to justify the removal of this land from the Green Belt, therefore the proposal attempts to set a precedent by which further development may not be needed to be justified upon such grounds either (thus opening the door to further attrition of the Green Belt through extensions to the settlement area on adjacent Green Belt land; second, the nature of the existing development within these three areas of most settlement contributes to the openness of the Green Belt land which characterises our village and should therefore remain, as a whole, ‘washed over’ by the Green Belt. This view has been expounded and supported by both the Parish Council and the Planning Inspectors, who are in agreement that the ‘insetting’ of the aforementioned land will cause huge difficulties in sustaining this key openness which is so characteristic of, and beneficial to our village.

I also object to the insetting and making permanent of both the Traveller site at Palm House Nurseries (Site A49), and the Travelling Show-people site at Whittles Drive (Site A50), upon the same grounds as above. Both sites contribute to the openness of Green Belt land, and are rated as ‘High Sensitivity’ in the Sustainability Appraisal 2017, and the view of the Parish Council and myself is that such a classification is contrary to the Local Plan’s intention to inset these sites. This would set a precedent for unjustified insetting and gradual breaking up of the Green Belt land, a matter that surely must be carefully examined and justified on a case by case basis.

Concluding comments

As a young person who has lived all their life in Normandy, many claims about local development are often made on my behalf, such as the need for new homes for young professionals/families, and other services to support these. I recognise the presence of such needs within the community, however I feel strongly about the need for well thought out planning and sustainable development. A key part of this is my firm belief in the value of regenerating brownfield sites, especially within the urban context, so as to reinvigorate our towns and cities with a view to making them more liveable spaces, instead of just sterile retail parks with a shortage local housing. Providing for more residential space within Guildford is a sure way
of relieving the pressure on our snarled up roadways. The flip side to this coin is to relieve pressure on Green Belt areas, which are of value in their own right, and in doing so preserve the quality of life for those living in villages which fall within the Green Belt outside of the larger town. I do not think that the solution to the lack of housing is to be found in building more housing developments in satellite villages, as this will only cause a negative knock on effect upon our already congested roadways, and will be extremely harmful to the open and green nature of the countryside which surrounds Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/767  **Respondent:** 10782177 / Elaine Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing again to object to the volume of building that is proposed to be built around East and West Horsley villages. Also no houses should be built on land that comes within the Green Belt.

The local infrastructure could not cope with the amount of development proposed. The roads, schools, doctors surgery and the station car park are overflowing.

I know that the planned properties to be built on the land at Wisley airfield are not included in the Horsley plan but it will also have a detrimental effect on our roads etc.

Our roads are very narrow and not in great condition so more traffic along them would cause more accidents in this already crowded area. Because of the Olympic route for cyclists we have a great many riders around our roads that also cause a dangerous problem.

I do not object to the odd small development of small affordable housing and encourage the Council to make more developers build more of this type of property.

I DO hope that Guildford Borough Council will reconsider this new plan and keep this area the joy that is to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/784  **Respondent:** 10782433 / Timothy Croxford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to convey my distress at the way in which GBC is proposing to wipe out the Green Belt status of Send Village, and impose huge numbers of houses and industrial space onto the local area of Send and Ripley Villages.

The local community/infrastructure will not be able to cope with the current plans, let alone the loss of Green Belt status, and GBC should withdraw and amend the current Local Plan with immediate effect.

I wish my email to be forwarded to the Planning Inspector to register my objections to the imposition of the GBC Local Plan, and the removal of Send Village from the Green Belt. I strenuously object to each and every one of the Council's plans for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/785  Respondent: 10782433 / Timothy Croxford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

As a resident of Send for 20 years, the appalling plans set out for Send and Ripley by GBC constitute nothing but the total destruction of the Green Belt for Send, and a huge increase in traffic on local roads which are in places simply one car wide.

To remove Send Village from Green Belt status, impose hundreds of houses on the area in addition to industrial space, and further create a massive road junction on already highly congested local roads is insanity. Schools, infrastructure, surgeries, local village lifestyle and the chosen way of life for thousands of people will simply buckle under these new ridiculous plans.

The Council quite simply appear to have thrown every ludicrous idea into a pot and come up with the destruction of village life in Send and Ripley, dismantling the area and covering it in concrete, together with a random number of new-build houses and industrial units which cannot be coped with in any conceivable way.

I wish this email to be forwarded to the Planning Inspector dealing with this completely ill-thought out local plan, and I object most strongly to the Council's obvious intention to wipe Send Village, its Green Belt rating and Ripley Village off the map, to be replaced by a grotesque building site destined to ruin the area completely and cause the utmost disruption to both villages for years on end.

These plans must not be allowed to go through - they are disgraceful, we are Green Belt here and must remain so. This is akin to being punished for wishing to live in the countryside by a bullying Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor waste water capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.6
Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.

Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.

Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.

Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4109  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/701  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
1. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8111 April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6549  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/1420  **Respondent:** 10782625 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/13706  **Respondent:** 10782625 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/13707  **Respondent:** 10782625 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
| Comment ID: PSLPP16/13709 Respondent: 10782625 / Heather Alexander Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13711 Respondent: 10782625 / Heather Alexander Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13711 Respondent: 10782625 / Heather Alexander Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13696  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13697  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13699  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of over development: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13700  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13702  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13704  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES):

• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13685  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13686  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13687  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF
- “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the detrimental impact on transport, local roads and road Ispecifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13713 | Respondent: 10782625 / Heather Alexander | Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)

• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13715  Respondent: 10782625 / Heather Alexander  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):

• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13716  Respondent: 10782625 / Heather Alexander  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):

- Just a list of generic measures, not related to real life or the particularities of Guildford.
- Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
- Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. i.e. most residents!
- Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1423  Respondent: 10782625 / Heather Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that air quality concerns have not been taken seriously- air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, Impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible Impact of the habitat degradation.

2. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13717  Respondent: 10782625 / Heather Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
- No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and well being (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13689  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1422  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13690  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hard standing sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13691  Respondent: 10782625 / Heather Alexander  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13684  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3652  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3647  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever
since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higheotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4340  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that housing on the Green Belt will increase traffic, lead to slower journey times and increase pollution and danger on the already busy roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15307  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15302  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15355  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15330  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15331  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15350  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the fact that the infrastructure (which is already inadequate) will not be able to cope with the increased demands for doctors, schools and roads etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15321 | Respondent: 10782689 / Murray Dudgeon | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4335 | Respondent: 10782689 / Murray Dudgeon | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt. The very nature of Green Belt is to protect the openness and permanence of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4336  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Green Belt sites meet the requirements for the Green Belt.

I object to the planned building on Gosden Farm, on Green Belt designated to protect West Clandon from being absorbed into an urban mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15281  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15286  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15269</th>
<th>Respondent: 10782689 / Murray Dudgeon</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4331  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my objections to the above plan which are ill considered and ill thought through. It is ridiculous to think that over 13,000 new homes are needed by 2033, which is an increase of 25%. To facilitate this growth huge areas of the Green Belt will be sacrificed with only around 30% of new homes being built on Brownfield land. Not only that but no thought appears to have been given to what affect all this development will have on the existing infrastructure which will surely be a breaking point with increased congestion and pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4333  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed scale of new building in the area, which is disproportionate and unjustified. The housing target is unconstrained and I would challenge the assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4338  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the other sites in the proposal, West Horsley, 3 Farms Meadow, Garlicks Arch, Blackwell Farm and the Hog's Back. All are out of proportion to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15274  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not
justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears
to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1705  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1710  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1715  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and...
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1720  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise
demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/785  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My specific objections are as follows:

- I object to fact that over 20,000 responses were registered to the 2014 Draft Plan and yet this plan is not materially different, meaning that the Consultation Process has not been properly followed.

I object to the fact that new sites have been proposed in this consultation which have not been considered before and is not appropriate at this stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/632  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strong disagreement to the latest revisions to the plan.

1) The plan to now provide 12,426 new homes seems excessive and based on erroneous projections and could lead to a needless loss of Greenbelt.

2) If the plan is adopted it could also lead to too much land being developed and potentially providing homes for Woking. Why should Areas of Natural Beauty be threatened to provide homes for Woking? This seems totally unfair and ill thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<thead>
<tr>
<th>Comment ID: PSLPP16/5975</th>
<th>Respondent: 10782849 / Peter Blake</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the principle of any plan that fails to recognise what the traffic problems presently suffering in Send (A247) are created by the extra burden to allow access to the A3 for “Woking” traffic - aggravated by the introduction of so-called “40 ton lorries”.

Has anyone on the committee taken the trouble to see for Him/Her self, traffic conditions in this area on a week day, term time, 08:30 – 09:20+?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/5974</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing this letter a matter of days since the outcome of the Referendum has been known to us and who will be our prime minister from this evening onwards.

This being so, I find that any writing again to revise objections to many of the points as your intentions showed NOT BE NECESSARY – but as your various schemes enforce, I wonder if your committee has decided that any plan you make whatever the outcome, will somehow slip through unnoticed while we are all fully occupied in digesting the changes in status of this country in relation to Europe.

For GBC to attempt to make radical changes to the Green Belt reads to me like unmitigated arrogance, and indeed shameful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Go back to the drawing board with and don’t just fiddle with bits and bobs – re-think your whole plan.

And I’m not necessarily using the roads at peak times – thousands are!!

Simply ticking boxes is not planning!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing with my objection to the new local plan. I'm objecting on the grounds of transport links, access to medical and educational facilities, as well as the complete disregard for the greenbelt. Firstly, the Tannery Lane proposal of 45 homes would bring the already grid locked Send Road (at peak times) to a halt as a potential 90 additional cars turning onto Send Road would cause traffic chaos. The site at the top of Send Hill also has no capacity for additional traffic. Both of these roads are accessed by Send Road or tiny lanes with few passing points. The lack of decent public transport in Send means that cars are essential with a lot of families needing 2 or more vehicles. The entrance on to the A3 is something that is required already. Adding 400 homes to Garlicks Copse will no longer alleviate the existing traffic burden and will add extra local traffic on Portsmouth Road / Send Road which you will still have to get across to get to the new junction. There is no possibility of scaling up the capacity of either the doctors surgery or the school to accommodate the proposed volume of new residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Finally, I'm objecting on the grounds that while there are brownfield sites available, building on greenfield spaces should not be permitted as it merely erodes the countryside that we are so fortunate to have on our doorstep.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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Development of this part of Send will result in even more traffic on the heavily congested A247. Furthermore, Tannery Lane is a country lane that was never designed to cope with the levels of traffic that 60 additional houses would bring. I objected when it was 45 (along with hundreds of other objectors). How upscaling this by a third, without improvement to the infrastructure (and flash flooding situation during heavy rain) could even be considered is truly alarming.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Comment ID: PSLPP16/749</td>
<td>Respondent: 10783489 / Rick Klink</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the proposal to take Send Business Park out of the Green Belt because it is located in an area of beauty next to the Wey Navigation. Developing in this area feels like an insidious move to completely remove Send from the Green Belt, while there are industrial spaces in Guildford this should not even be considered. This would further amplify my point re: traffic above in Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1579</th>
<th>Respondent: 10783777 / Neil Adams</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> GUILDFORD PROPOSED LOCAL PLAN 6/6/2016</td>
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**FIELDS BEHIND SHALFORD VILLAGE HALL**

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
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<tr>
<th>Comment ID: PSLPP16/584</th>
<th>Respondent: 10783873 / G. M. Puddle</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the moving of the Urban Boundary to encompass the site for the new Burial Ground north of Salt Box road. As far as I understand you do not need to change the Status of the Land from Green Belt to Urban for a Cemetery. It is lawful to place a Cemetery on Green Belt, therefore there is no need to go to the cost of altering the Land’s Status.</td>
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<td>If I have misunderstood, please confirm back to me.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/1206</th>
<th>Respondent: 10783937 / Daphne Jackson</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I understand there are proposals to build in excess of 500 houses on six sites in and around East and West Horsley, enlarging the village boundaries and removing the Green Belt designation within. I strongly object to these proposals. The Horsleys have a unique character which would be hugely compromised if building went ahead on the scale proposed. The Green Belt designation should remain and on no account be removed. The Green Belt is there to protect the countryside from erosion due to urban sprawl and inappropriate building. Our countryside is precious and necessary for health and wellbeing.</td>
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<td>Traffic is already heavy during rush hour and school pick up times, and Ockham Road through the village is always busy with traffic (including large lorries) cutting through from the M25 and A3. To add a substantial amount of local traffic to this would be totally unacceptable..</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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| **Page 1773 of 3142**
Thank you for your letter of June 2nd

I have read your “Proposed Local Plan” and I am now replying with my views.

My objections are:- the removal of send from the green belt. A large area of beautiful countryside will be lost to thousands of people so I object to the huge number of houses that are planned to be built. I object to the Garlick’s Arch policy (A43), which will include the filling of very ancient trees, to build to proposed 400 houses, light industry and storage space on Green Belt. I object to new slip roads at Burnt Common (A43a).

The A247 is already a very busy road and a dangerous one for pedestrians to cross. At peak times the traffic is at a standstill.

I object to the proposal to build 40 new houses and two traveller pitches on Send Hill (A44). The number is far too large. The area is a formal refuse sight, but now is a part of beautiful countryside and totally out of keeping for your proposal.

The number of extra people in Send would create a huge problem for the medical centre. There are currently over 7000 patients on record.

Also the schools are already full and parking to deliver and collect children on Send Hill causes a huge problem to local residents so I object to these proposals. I object to the wholesale destruction of Green Belt in the area. It would be a sad day for many people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also understand that, with the boundaries of the villages being enlarged, they are to be taken out of the green belt, a move to which I am wholly opposed.

I am amazed to see that, despite its having been unanimously rejected by the council, the development at Wisley Airfield has reappeared in the plan. It is totally pointless to have discussions about the proposals for East and West Horsley, without, at the same time discussing these far larger and totally overbearing developments, because whatever additional facilities are built there, the impact on the Horsleys will be far larger than anything in the local plans.

As you are already aware, the A3 is already drastically overburdened and daily comes to a standstill often by 4.30 in the afternoon. To even consider a development at Wisley before this dire situation has been remedied, is foolish beyond measure. This apart, the traffic along Ockham Road North would be greatly increased, as would use of Horsley station itself.

I am, as you will have gathered, totally opposed to the airfield development and I speak as a resident of some 49 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2031  Respondent: 10784385 / Rosemary Washbourne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to protest most strongly against the New Local Plan for at least 533 more houses proposed for East and West Horsley as the infrastructure would not be able to cope.

It would mean:-

1) an even longer wait to get an appointment with a doctor

2) the local schools would not have spaces an increase in the number of children

3) There would not be enough car parking spaces at Horsley station - the present car park is not adequate for what is required now.

4) sometimes one cannot get into the car park behind the shops - with more houses it would be even more difficult.

5) the exit from Thatcher's Hotel on to the A246 would become even more dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1778  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPA16/3859</th>
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<th>10784769 / Jane Baker</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/3497  | Respondent: | 10784769 / Jane Baker  | Agent: |
I OBJECT to Policy A43 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7229  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7230  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of 4 Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from travellers' pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7711   Respondent: 10784769 / Jane Baker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In GBC's paper *About Guildford* you have a feature concerning the Local Plan in which you pose the question: *Is your Green Belt under threat?* Your answer includes the sentence:

*Only sites that propose sustainable solutions have been included in the Plan, and the Plan would reject any schemes that would have a detrimental effect on the green belt.*

How can this fit in with your aim to strip 15 villages, including Send and Ripley where I live, of their green belt status? Such an action would allow greedy and unscrupulous developers, (already gathering ready to pounce) carte blanche with our precious countryside.

The duplicity of your supposed reassurance on the matter of the Green Belt and the cynical and underhanded manner in which you are treating your citizens concerning other aspects of the Plan is disgraceful. I therefore protest in the strongest terms against the Local Plan for the following reasons:

**I OBJECT** to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7712   Respondent: 10784769 / Jane Baker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1791</th>
<th>Respondent: 10784769 / Jane Baker</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp172/2938</th>
<th>Respondent: 10784769 / Jane Baker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I therefore strongly object to the following:
Clockbarn Nursery, Tannery Lane, Policy A42
Now 60 homes in place of 45 previously.

The increase of 45 houses to 60 is 33% more and too much.
It will worsen traffic problems at Tannery Lane (Please note this is a LANE) and at the already dangerous junction of A247.
It will erode the green belt of the village even more.
It will worsen surface water flooding which is already bad.
It will impact on the countryside views from the River Wey Navigation which is enjoyed by many people visiting the county as well as locals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2939  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43
Now 400 homes and six Travelling Show people plots.
I object to the Policy A43 change at Garlicks Arch because:

It ignores the thousands of previous objections made by local people.
There is no proven demand for Travellers' plots at this location.
It is an ancient woodland that existed at the time of Elizabeth 1.
It will join up Ripley and Send defeating the purpose of the Green Belt.
It is subject to frequent flooding and is currently flood zone 2 allocation.
It will generate excessive traffic onto already busy local roads in Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2940  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58
Now a NEW allocation for a minimum of 7000 sq m. of industrial warehousing.
I object to policy A58 at Burnt Common because:
It was DELETED from the first draft because of all the previous objections and should therefore NOT have been reintroduced.
There is no need to build an industrial development on Green Belt when sites still exist at Slyfield and Guildford.
The 2017 Employment Land Need Assessment shows a REDUCTION in demand to 3.9 hectares for industrial land NOT a huge over allocation of 10 hectares on Send Green Belt land.
The impact on already busy roads will cause gridlock, especially when the A3 is blocked and traffic tries to get down the slip road and through Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1338  Respondent: 10784769 / Jane Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2 paragraph 4.3.15
Send Business Park to be taken out of Green Belt
I object to the proposal to inset Send Business Park from Green Belt, because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation. There is highly restricted vehicular access along Tannery lane.
Further expansion or development at this location detracts from the Green Belt and is inappropriate.
I suspect that none of the members of the Planning Committee live anywhere near Send or Ripley and that their own wards are not being subjected this wholly unnecessary Local Plan of destruction of both our village environment and the precious Green Belt.
As already stated, I and the other 10,000 or so inhabitants of this area find the Planning Committee actions totally undemocratic and unsustainable.
We can only hope that MAYBE this time round our objections will be heard and answered sympathetically. Sadly, given Guildford Borough Council's actions so far, I am sceptical of this happening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2146  Respondent: 10785633 / Penelope Eagle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2147  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2145  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4261  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highecotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9127  Respondent: 10785633 / Penelope Eagle  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9135  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** PSLPP16/9136  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I OBJECT** to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**I OBJECT** to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9124  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9125  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Page 1790 of 3142
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9126  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9138  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9134  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9132  Respondent: 10785633 / Penelope Eagle Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9133  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT** to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9137  **Respondent:** 10785633 / Penelope Eagle  **Agent:**
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

| I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.) The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.) The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included. |**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**|

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT**, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

**I OBJECT** to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9129</th>
<th>Respondent: 10785633 / Penelope Eagle</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9130 Respondent: 10785633 / Penelope Eagle Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9121 Respondent: 10785633 / Penelope Eagle Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9122  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9119  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9120  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/1256</th>
<th>Respondent: 10785633 / Penelope Eagle</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1257</th>
<th>Respondent: 10785633 / Penelope Eagle</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1258  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Diocese of Guildford supports draft Local Plan Policy P2 Green Belts in relation to land at Send.

Where appropriate, insetting complies with Section 9 of the National Planning Policy Framework (NPPF), particularly para 85 where Green Belt boundaries are defensible and ‘use physical features that are readily recognisable and permanent’.

At Send, the new Green Belt boundary that forms the southern edge of the village consists of a mature, dense belt of trees that gives a strong, defensible natural edge to the village. The Diocese of Guildford supports this new boundary and welcomes the removal of the land and buildings of Send First School and St Bede’s Junior School (and the sports pitches between the 2 schools) from the Green Belt. The land makes little contribution to the five established purposes of the green belt and is not clearly visible to those outwith the school facilities and therefore has limited visual amenity benefit failing to contribute to the ‘openness’ of the Green Belt as required by para 79 of the NPFF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY A42 because you have increased the number of house from 45 to 60, an increase of 33%. There are a lot of objections to the original number were raised so why increase it? I feel this increase is unacceptable and will lead to a considerable increase in traffic on an already extremely busy road.

The Government policy was to protect the green belt which you seem to ignore. The land around Send already floods in winter so where will the water go when it is concreted over? Probably to flood the existing houses.

Send is an ancient village mentioned in the Domesday Book so building on the greenbelt will destroy the nature of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I also OBJECT TO POLICY A43 change at Garlicks Arch because of the number of homes to be built despite previous objections. 6 plots for travelling show people is totally unnecessary as there is no proven demand. It will change the nature of Send and Ripley as two separate villages and will generate excessive amounts of traffic.

It is a flood risk area and is contaminated by lead shot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1577  **Respondent:** 10786113 / John Creasey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I also OBJECT TO POLICY A58 because it was deleted from the 2014 draft due to the number of objections and the word minimum has been changed from maximum, and since 2016 there has been a reduction in demand for industrial land.

Guildford and Slyfield have empty sites and industrial units so this should be used.

The 2017 Employment Need Assessment shows a reduction in demand for industrial land for the whole Borough.

This will generate a huge increase in traffic and cause gridlock on the local roads. The green belt is precious and should be protected. All this development needs new infrastructure such as additional sewage works. Can the Doctors surgery cope with the additional people. Are the schools capable of accepting the additional children. I understand there will be a shortage of places for children above infants schools. What is being done in the plan to cover the situation with Doctors surgery and Schools.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11131  **Respondent:** 10787073 / Clare Arnold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes for all - I object to this part of plan as the planned developments in the area are too high in density and will disrupt the nature of existing street patterns which is in contradiction to the aim

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11132  Respondent: 10787073 / Clare Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 - Affordable homes - I object to this part of the plan as the houses proposed in the villages of The Horsleys will not be in the reach of many of the people who are entitled to purchase 'affordable homes'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11133  Respondent: 10787073 / Clare Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 - Green Belt - I object to the plans to remove areas of the Guildford Borough from the Green Belt, maintenance of the Green Belt is essential to maintain the character of the Borough and the proposal does not warrant 'exceptional circumstances'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/11134  **Respondent:** 10787073 / Clare Arnold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood risk - I object to the lack of Flood Risk monitoring that has been performed and this will present significant risk to the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11130  **Respondent:** 10787073 / Clare Arnold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 Spatial development strategy I object to this policy part of the plan as the villages of Horsley and Ripley are designated as district centres, this does not reflect the facilities available at these sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2134  **Respondent:** 10788001 / William Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of the former Wisely Airfield. This will have a massive and detrimental effect on the present road system. There will be increased congestion at the Ockham roundabout as there is no provision for traffic heading South to access the A3. Traffic will travel through Ripley, and contributes to the times before the A3 by hours.

Increased traffic will lead to further air pollution. Motorists wishing to travel by train from Horsley and Effingham Junction will be unable to park, places are already full.

Road Closures in the Ockham area will create havoc.

The new roundabout at Newark lane and Ripley High St. is not necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPA16/2113  | Respondent: 10789601 / Jennifer Hodgetts  | Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the latest group of proposed developments for Send. The GBC have not followed correct procedure and their reasoning is unsound and underhand. There is no evidence in 2015 for an increase in employment space – quite the opposite an 80% reduction shows from the 2013 ELNA carried out by GBC. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPA16/2114  | Respondent: 10789601 / Jennifer Hodgetts  | Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I feel very sad that our elected councillors and planning officers could even think of destroying our communities in Send and Ripley. There is no need for all the green belt to be built on. I would like these comments to be seen by the inspector and hope good sense will prevail. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPS16/4218  | Respondent: 10789601 / Jennifer Hodgetts  | Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to this plan. There are no exceptional circumstances to justify building 400 houses and 7000 square metres of industrial and warehousing. This is a site of local pride and interest. It includes ancient woodland and trees that should be protected, being 400 years old. There are already 13860 houses proposed by GBC. These plans were not included in the regulation 18 draft and should be declared invalid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4219  Respondent: 10789601 / Jennifer Hodgetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to land west of Winds Ridge and Send Hill being designated for 40 homes and 2 pitches for travellers. This also is a new plan not included in regulation 18 draft. Not consulted upon previously. Not suitable for development due to Green Belt status. The existing site contains documented unsafe land fill waste.

The narrow single track country road does not provide sufficient access to the proposed site. This makes the whole proposal inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8930  Respondent: 10789601 / Jennifer Hodgetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to send being removed from the green belt status. The village acts as a buffer between Woking and Guildford and prevents urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/110  Respondent: 10789921 / Kevin Allen  Agent:
The proposed plan for Guildford Borough Council (GBC) to develop the Wisley airfield site (Policy no. A35 on the plan) is inherently flawed and will have a significant negative traffic and infrastructure impact on the surrounding area of Ockham and the Horsleys.

The development is far too large and proposes over 2000 new homes supporting a population of 5-6000 new residents, in an area with an already limited and constrained transport network.

East Horsley, which is 3rd in the GBC settlement hierarchy with 3,800 residents, will be completely overshadowed by this gross proposal.

The expected overall requirement for new housing in the borough can easily be satisfied by an incremental approach, developing several areas over time - rather than a completely new Semi-Urban Village.

Sensitively expanding existing villages via low density developments would provide over 8,000 new dwellings - compared to a single 'lump' of 2,000 at Wisley (ref: Wisley Property Investments (WPI) report prepared by Savills, Nov 2013).

Increased traffic movements via the proposed road access points at the Ockham/A3 roundabout/interchange (65%) and Old Lane (35%), will undoubtedly cause chaos on the local road network. At peak times this interchange/the A3 are already operating at 90-95% capacity.

Proposed public transport improvements - 3 or 4 extra buses? will have little effect on the access to the area for most residents. Commuting to London will realistically need to be via Effingham junction or Horsley Network Rail stations, only accessible via 2 local lanes/roads. These roads cannot possibly support (say) an extra 1-2,000 commuters trying to access the stations by car. The stations themselves have no further capacity for commuter parking, which will impact nearby residential roads.

In summary, my wife and I are completely opposed to the proposed large scale 'Semi-Urban Village' development at Wisley. We believe the documented alternative proposal for sensitive incremental development of existing villages is the option to take. This is in line with policy precedents and will provide over 4 times the amount of dwellings planned at Wisley, as required by the GBC local plan over the relevant timescale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The updated proposals map for Effingham (Page 380 AND 381 of Appendix F) shows how the village boundary will be inset from the Green Belt and the relationship of this boundary to the Effingham Village conservation area.

We object to the amended Green Belt Boundary to Effingham Village on the grounds that it will lead to the merging of Effingham and Bookham and fails to give full consideration to the requirements of the NPPF in terms of the need to make full use of natural and man made features to create defensible green belt boundaries. The green belt boundary should be amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

Below is a more detailed analysis of why the proposed village boundary to Effingham is unsound contrary to paragraph 80 and 85 of the NPPF. Attached is our Green Belt Assessment of Effingham Village which examines the character of the Green Belt here in far more detail and should be taken into account in the consideration of amending the Green Belt boundaries here:

Land north east of Effingham Village

- The area to the north-east of Effingham Village currently serves a number of green belt purposes in terms of preventing urban sprawl and keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt that serves all of these purposes.
- Land to the North East of Effingham Village currently serves a number of these purposes, more so than other parcels of land adjoining the village, which should be allocated instead. Details are set out below:
  - **Purpose 1: ‘To check the unrestricted sprawl of large built-up areas’**: The parcel of land north–east of Effingham currently restricts the built up area of Effingham and Great Bookham and plays a vital role.
  - **Purpose 2: ‘To prevent neighbouring towns merging into one another’**: This is the prime purpose of this piece of green belt as it prevents the villages of Bookham and Effingham from merging into each other. If this site was built upon then there would be a continuous development from one village to the other and the gateways between the two villages would completely disappear.
  - **Purpose 3: ‘To assist in safeguarding the countryside from encroachment’**: The allocation of this site for development would lead to significant development encroaching into the Countryside. Unlike our client’s site opposite on Effingham Common Road, there are no natural or man made barriers to the north to prevent the Countryside form further encroachment in the future. This allocation is therefore contrary to advice contained within Paragraph 85 of the NPPF which states that local authorities, should define boundaries which are clear and use physical features.
  - **Purpose 4: ‘To preserve the setting and special character of historic towns’**: Effingham is an historic village and conservation area. However this site is not immediately adjacent to the historic core and development is unlikely to have a significant affect on the character of the village. Not withstanding this, the sites have an open character and forms a gateway into the village which is currently green fields leading into an historic core will be severely eroded as a result of this allocation.
  - **Purpose 5: ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’** This is not relevant here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The green belt boundary should be amended and the TREG site on Effingham Common Road to the north of the village should be taken out of the Green Belt. The Ancient Woodlands to the North and West should form defensible boundaries to the Green Belt instead of rear gardens to dwellings.

**Attached documents:**

- [131122 EFFGreenBelt.pdf](131122 EFFGreenBelt.pdf) (1.0 MB)

**Comment ID:** pslp171/1133  **Respondent:** 10789985 / TREG Consulting (Waleed Al Qadoumi)  **Agent:** ECA (Martha Covell)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy identifies a need for 12,426 new homes within the plan period (2015-2034) and the revised delivery rate of 450 dwellings per annum (dpa) in 2019/20 rising to 850 by 2033/34.

This development strategy relies on the allocation and development of Wisely Aerodrome, yet this is an isolated location and does not represent a sustainable form of development. Wisley Airfield Aerodrome is located between the settlements of Effingham and Ripley, but due to its location, very close to the A3 and its junction with the M25 people living here will be over-reliant on their car and very unlikely to use public transport.

We object to the allocation of Wisley Aerodrome for development on the grounds that:

(1) This is an isolated location away from shops and services and this does not represent a sustainable form of development. The scale of development proposed (2000 houses) is not sufficiently large to support a sufficient number of shops and services in its own right and therefore residents will need to rely on the car to access other local shops, primarily in Ripley;

(2) The site comprises a designated Special Protection Area (SPA), Important Bird Area, Local Nature Reserve and Registered Common Land is also located to the north of the disused airfield within Ockham Common. The northern part of the site is within the 400 meter SPA buffer where residential properties cannot be accommodated.

(3) Approximately 17 ha of the airfield to the north west is safeguarded under the Surrey Waste Plan and should be preserved for this important strategic facility.

(4) Aerodromes by their very nature have an open character and are within isolated locations and the character of this site, including its linear and open character does not lend itself to development.

(5) The site currently serves a number of green belt purposes in terms of keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt which serves these purposes for the following reasons:

Purpose 3: To assist in safeguarding the countryside from encroachment. The allocation of this site for development would lead to significant development encroaching into an isolated open Countryside location where there is currently very little development. It would have a detrimental impact on the open character of the area and countryside.

Purpose 5: ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’. The former runway represents previously developed land, but it has an open character in an isolated countryside location. Development here has the potential to make alternative regeneration sites within Guildford less attractive to developers and potentially less viable.

A far more sustainable form of development would be to release green belt sites adjacent to large villages which already benefit from existing shops and services and are within a short distance to an existing train station.

Effingham is a sustainable location for development, yet the revised Local Plan fails to allocate any significant sites for development here despite it being within cycling distance from Effingham Junction railway station and containing a number of shops and services.

We support the areas around villages as sustainable locations for housing development and suggest that more housing is allocated in these areas as this is preferable to the allocation of Wisley Airdrome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Guildford Borough Green Belt and Countryside Study and SHLAA and LAA are unsound as set out below:

Strategic Housing Land Availability Assessment AND Guildford Borough Land Availability Assessment

- We set out our case for consideration of a ‘sustainable mixed use development’ on a green belt sites in Effingham (Land West of Effingham Common Road (Presumed Site Ref. 1408?) in submissions made to Guildford Borough Council (GBC) on 15th October 2010 and 19th January 2011 (copy of covering letters enclosed in the appendices) as a result of Guildford’s ‘Call for Sites’. In both cases we submitted planning and landscape appraisals, constraints plans, Transport and Ecological Assessments and schematic master plans. We also submitted an assessment of each sites Suitability, Availability and Achievability in line with the SHLAA Practice Guidance. We confirmed that both sites could be delivered within 6 – 15 years and we requested due consideration in the ongoing review of the SHLAA and Green Belt and Countryside Study.

- However the SHLAA failed to include an assessment of the site submitted. We set out further concerns and copied our original submission to GBC in a letter dated 10 September 2013. Yet the updated (2014) SHLAA still failed to include an assessment of this fringe site and the published report offers little robust justification as to why this is the case.

- The Guildford Borough LAA (2016 and Addendum 2017) does include a list of 'Green Belt, Discounted Sites'. We can only assume that our site is included as Site Ref: 1408 'Land West of Effingham Common Road';

- Regulation 18 (3) of the Town and County Planning (Local Planning (England) Regulations 2012 places an obligation on GBC to consider all representations to the Local Plan. This states that "in preparing the Local Plan, the planning authority must take into account any representations made to them". Having reviewed all documentation in detail, our submissions to the SHLAA ‘Call for Sites’ are and remain ‘invisible’.

- Normal practice is for all sites offered in the SHLAA ‘Call for Sites’ to be assessed. This allows an objective and consistent appraisal to be made initially of each site, unconstrained by (but still mindful of) existing local polices. This establishes what land supply there may be available to meet development needs and provides a transparent comparison of options available to meet these needs. This initial appraisal of sites then further be tested for allocation through the Sustainability Appraisal process.

- The SHLAA sets out the sources used to identify sites and confirms that this included information from the Green Belt and Countryside Assessment (GBCA). However the SHLAA itself provides no real justification for
the methodology followed and it appears that the GBCS has had an overbearing and unjustified influence on the
SHLAA assessment criteria. When we questioned officers directly, GBC provided the following justification for
the exclusion of certain sites in the SHLAA by stating (email of 2nd November 2011, Heather Sandell to Martha
Covell). ‘Please be aware that the SHLAA is being informed by the Green Belt and Countryside Study. ……It is
not possible to obtain the SHLAA assessment sheets as the work on the SHLAA is still in progress. For sites
outside of the village settlements and urban areas, the Green Belt and Countryside Study is effectively the
assessment sheet. If sites are not identified in the Green Belt and Countryside Study as potentially suitable for
residential development, no further assessment work is required.’ A further email on 22 August 2013 states ‘All
land in the Green Belt cannot possibly be suitable for development, if it were, it would of course undermine the
whole purpose of the Green Belt. We have used our GBCS to test suitability of land suggested to us that is in the
Green Belt.’

• The NPPG (6/3/2014) sets out the methodology that should be undertaken in preparing housing and economic
land assessments. In relation to Stage 1 ‘How should sites/broad locations be identified? It states: ‘When carrying
out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and
broad locations for development (including those existing sites that could be improved, intensified or changed).
Sites, which have particular policy constraints, should be included in the assessment for the sake of
comprehensiveness but these constraints must be set out clearly, including where they severely restrict
development. An important part of the desktop review, however, is to test again the appropriateness of other
previously defined constraints, rather than simply to accept them. Plan makers should not simply rely on sites
that they have been informed about but actively identify sites through the desktop review process that may have a
part to play in meeting the development needs of an area.’

• Whilst the SHLAA does not allocate sites, there can be no justification for the rejection of sites from further
assessment within the SHLAA, based solely on their inclusion within current green belt boundaries, which as the
Local Plan Issues and Options version, confirms in paragraph 6.5, establishes the special circumstances to require
the green belt boundaries in the Borough to be reviewed. It remains our view that the GBCS and SHLAA
evidence conflates the distinctive roles of each and contrary to the purpose of each study.

• On this basis, the Local Plan process fails to comply with Regulation 18(3) and the emerging plan is unsound as
there is no evidence that GBC have had regard to any of our submissions and made an appropriate assessment of
all sites, including fringe sites. This is contrary to guidance contained within the NPPG.

**Guildford Borough Green Belt and Countryside Study**

• GBC’s methodology is that if sites are not identified in the Green Belt and Countryside Study (GBCS) as
potentially suitable for residential development, no further assessment work is required and the site is excluded
also from the SHLAA. Hence the Green Belt Study is critical. Despite the significance of the document, GBC
have not consulted on the study (unlike Mole Valley who consulted on the GB Review methodology) and the
weight that can be attached to it is therefore limited. We object on the grounds that the Council have failed in
their legal duty to co-operate in this respect.

• Paragraph 1.3 of the 2013 Summary Report confirms the key requirement of the study is to inform Local Plan
options by assessing ‘sustainable locations for green field release’. Whilst ‘sustainability’ is the golden thread
running through plan making and decision taking process (Paragraph 14 of the NPPF) the methodology adopted
in the GBCS gives little weight to the five main purposes of the green belt as set out in the NPPF (paragraph 80).

• We acknowledge there is no statutory guidance and methodology for undertaking a green belt review. But since
the commencement of the Guildford Green Belt Study in 2009, there has been a considerable quantity of
emerging practice to illustrate a sound approach.

• The Gloucester/ Cheltenham/ Tewkesbury (GCT) Green Belt review for example contains an examination of
practice much of which is endorsed as being soundly based. This review identifies parcels of land for assessment
purposes and then assigns a significance rating to the contribution of each parcel against each green belt purpose.
It makes no further technical assessment.

• This approach differs greatly from the Guildford GBCS, which judged each parcel against the Green Belt
purposes on a Yes or No basis, rather than a comparative rating. It then identifies potential development areas
based on environmental capacity and accessibility, the latter offering no quantifiable evidence. Further more the
parcels of land assessed are large and in themselves have a diverse character. The parcels pay little regard to
physical features that can define green belt boundaries and therefore the assessment is contrary to paragraph 85 of the NPPF and is unsound.

- The approach blurs the distinction between the Green Belt assessment process and decision-making. Such considerations are better dealt with as part of the testing of potential development areas, when a wider range of factors can be taken into account within the remit of the sustainability appraisal.

- It is clear that the failure to apply a significance test to the review of parcels in the GBCS has resulted in many parcels all scoring well in green belt terms and hence undermining the reviews principle purpose. A yes/no judgment is an unsound approach and ‘scoring’ parcels which the GBCS mistakenly has done, does not enable any differentiation between the significance of parcels and hence the impact of development on green belt purposes.

- This is illustrated for example throughout the commentary on Potential Development Areas (PDA) in Volume 1 of the GBCS, which repeatedly states that green belt purposes are not significantly compromised (e.g. Table 1.27 “D10 and E9 provide opportunities to accommodate appropriate development without significantly compromising green belt purposes). No test of significance has been applied in aggregate to the green belt purpose of each parcel and hence renders the exercise ineffective and this point is acknowledged in GBCS Vol. 1 paragraph 1.8: “If the high scoring parcels were removed from consideration it would have meant a number of villages could not have included a PDA...it was considered that to initially exclude villages from being able to accommodate a PDA as part of this Study may conflict with subsequent spatial strategies identified by the Council”. Similar points are also made in Volume 3 paragraph 10.2 and 10.3.

- Parcel E9 and the identification of PDA E9-B is a good example of the unsoundness that results from the approach adopted.

- The Environmental Capacity Analysis for Effingham, as contained within Volume III provides inconsistent analysis of the settlement gateways and the existing and proposed ‘defensible green belt boundaries’. It states:

‘Open ground is located to the north of Leewood Way and Lower Road. Access to the open ground to the north of Leewood Way (TREG consulting site) is limited and potential development is considered to conflict with the perceived settlement ‘gateway’ on Effingham Common Road. Open ground to the north of Lower Road and the horticultural nursery is framed by mature tree belts and woodland at Thornet Wood’.

- This analysis is incorrect for three reasons, namely:

  - (1) the open ground located to the north of Leewood Way (TREG Consulting site) benefits from direct access off Effingham Common Road and also direct access from some of the rear gardens off Leewood Way;
  - (2) The master plan proposals developed by TREG Consulting show that the proposals could preserve and enhance the ‘perceived settlement gateway’ due to the high embankments, established tree belts and sensitive design features;
  - (3) The mature tree belt to the north, east and west of the Leewood Way site (TREG Consulting site) is not identified, even though it comprises ancient woodland to the east, a road to the west and a mature tree belt and embankment to the north. This compares with the Lower Road site, which gives Thornet Wood considerable weight and allocates it as a potential ‘defensible’ green belt boundary.

  - Secondly the analysis in Volume III identified two ‘settlement gateways’ to the north and east of Effingham, yet the analysis is given different weight as the site adjacent to the eastern gateway is identified as a PDA and the site to the north is not. Indeed the analysis of the eastern gateway (Lower Road) confirms that this gateway plays a more significant role than the northern gateway (Effingham Common Road) as this comprises open ground and is within the Effingham Conservation Area. It states: ‘East: The perceived settlement gateway is located along Lower Road and the A246 Guildford Road to the east of the village.... Open ground to the east of the village maintains separation between Effingham and Little Bookham to the east. This open ground is also located within Effingham Conservation Area’.

  - Volume IV of the GBCS starts to define new Green Belt boundaries. Stage 2 ‘Assessing the locations for potential Green Belt defensible boundaries surrounding each village within Guildford Borough’ lists defensible green belt boundaries ‘which provide physical and/or visual separation to the wider Green Belt’ but the features listed are very inconsistent and the assessment is subjective. For example in the Effingham Assessment, the boundary ‘2R’ is a fence line. But in reality this is a very low fence at the end of residential properties and has been taken down and includes gates in some situations. The edge of the urban area is very ‘raw’ and evident in landscape terms here and this is not actually a very
defensible green belt boundary. In contrast, the fence lines and boundary walls near to ‘2B’ on the opposite side of Effingham Common Road have been disregarded. Instead Thornet Wood ‘2A’ a considerable distance to the north, has been taken into account.

◦ The TREG Consulting site, on the west side of Effingham Common Road has tree belts/woodland surrounding it to the north, east and west yet these, with the exception of the woodland, have all been disregarded.

◦ We have also noted inconsistencies in the GBCS e.g. the assessment of development impact on village ‘settlement gateways’. Of the 37 ‘settlement gateways’ identified in the GBCS, only one gateway to the north of Effingham on Effingham Common Road, adjacent to TREG Consulting site, has been assessed for development impact. Either such an assessment (which as we have set out, we consider strays beyond the scope of a GB review) is made against all ‘settlement gateways’ or not at all. As it stands, this is clearly an inconsistent use of evidence and wholly unjustified.

◦ We have undertaken our own Green Belt Assessment of Effingham based on testing significance and have submitted copies with this representation.

◦ On the basis set out above, we consider Volumes 1 to 5 of the GBCS are unsound and lack sufficient robust justification for the identification of Potential Development Areas within the Green Belt. To make the GBCS sound we recommend the adoption of the significance test as we have outlined and submitted in reviewing the published green belt recommendations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 131122 EFFGreenBelt.pdf (1.0 MB)

Comment ID: pslp17q/191 Respondent: 10789985 / TREG Consulting (Waleed Al Qadoumi) Agent: ECA (Martha Covell)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Strategic Housing Land Availability Assessment AND Guildford Borough Land Availability Assessment

• We set out our case for consideration of a ‘sustainable mixed use development’ on a green belt sites in Effingham (Land West of Effingham Common Road (Presumed Site Ref. 1408?)) in submissions made to Guildford Borough Council (GBC) on 15th October 2010 and 19th January 2011 (copy of covering letters enclosed in the appendices) as a result of Guildford’s ‘Call for Sites’. In both cases we submitted planning and landscape appraisals, constraints plans, Transport and Ecological Assessments and schematic master plans. We also submitted an assessment of each sites Suitability, Availability and Achievability in line with the SHLAA Practice Guidance. We confirmed that both sites could be delivered within 6 – 15 years and we requested due consideration in the ongoing review of the SHLAA and Green Belt and Countryside Study.

• However the SHLAA failed to include an assessment of the site submitted. We set out further concerns and copied our original submission to GBC in a letter dated 10 September 2013. Yet the updated (2014) SHLAA still failed to include an assessment of this fringe site and the published report offers little robust justification as to why this is the case.

• The Guildford Borough LAA (2016 and Addendum 2017) does include a list of ‘Green Belt, Discounted Sites’. We can only assume that our site is included as Site Ref: 1408 ‘Land West of Effingham Common Road’?
• Regulation 18 (3) of the Town and County Planning (Local Planning (England) Regulations 2012 places an obligation on GBC to consider all representations to the Local Plan. This states that "in preparing the Local Plan, the planning authority must take into account any representations made to them". Having reviewed all documentation in detail, our submissions to the SHLAA ‘Call for Sites’ are and remain ‘invisible’.

• Normal practice is for all sites offered in the SHLAA ‘Call for Sites’ to be assessed. This allows an objective and consistent appraisal to be made initially of each site, unconstrained by (but still mindful of) existing local polices. This establishes what land supply there may be available to meet development needs and provides a transparent comparison of options available to meet these needs. This initial appraisal of sites then further be tested for allocation through the Sustainability Appraisal process.

• The SHLAA sets out the sources used to identify sites and confirms that this included information from the Green Belt and Countryside Assessment (GBCA). However the SHLAA itself provides no real justification for the methodology followed and it appears that the GBCS has had an overbearing and unjustified influence on the SHLAA assessment criteria. When we questioned officers directly, GBC provided the following justification for the exclusion of certain sites in the SHLAA by stating (email of 2nd November 2011, Heather Sandell to Martha Covell), ‘Please be aware that the SHLAA is being informed by the Green Belt and Countryside Study. ……It is not possible to obtain the SHLAA assessment sheets as the work on the SHLAA is still in progress. For sites outside of the village settlements and urban areas, the Green Belt and Countryside Study is effectively the assessment sheet. If sites are not identified in the Green Belt and Countryside Study as potentially suitable for residential development, no further assessment work is required.’ A further email on 22 August 2013 states ‘All land in the Green Belt cannot possibly be suitable for development, if it were, it would of course undermine the whole purpose of the Green Belt. We have used our GBCS to test suitability of land suggested to us that is in the Green Belt.’

• The NPPG (6/3/2014) sets out the methodology that should be undertaken in preparing housing and economic land assessments. In relation to Stage 1 ‘How should sites/broad locations be identified? It states: ‘When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them. Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area.’

• Whilst the SHLAA does not allocate sites, there can be no justification for the rejection of sites from further assessment within the SHLAA, based solely on their inclusion within current green belt boundaries, which as the Local Plan Issues and Options version, confirms in paragraph 6.5, establishes the special circumstances to require the green belt boundaries in the Borough to be reviewed. It remains our view that the GBCS and SHLAA evidence conflates the distinctive roles of each and contrary to the purpose of each study.

• On this basis, the Local Plan process fails to comply with Regulation 18(3) and the emerging plan is unsound as there is no evidence that GBC have had regard to any of our submissions and made an appropriate assessment of all sites, including fringe sites. This is contrary to guidance contained within the NPPG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3815  Respondent: 10790209 / J. Albury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I am not at all happy regarding the proposed development in Normandy.
- 1) Green Belt land, which is known for its wildlife - birds, deer, foxes and wildflowers will be ruined.
- 2) roads, the village is known to set gridlocked when the A31 or A3 is blocked. What will happen if you add another 2000 cars. Vans, lorries on the roads, the junctions at Guildford Rd Glasier lane and Westwood Lane can be a problem now.
- 3) roads, the village is known to set gridlocked when the A31 or A3 is blocked. What will happen if you add another 2000 cars. Vans, lorries on the roads, the junctions at Guildford Rd Glasier lane and Westwood Lane can be a problem now.
- During rush hours its difficult to turn right from willows Park.
- 3) Condition of the Glasier lane and Westwood lane surface of roads is poor now. Future?
- 4) Doctors surgery- can be difficult to get an appointment now. 2000 people will overwhelm the surgery.
- 5) Do we need another secondary school? We have 5 in Guildford Borough already.
- 7) Damage to woodland by construction work- knock on effect on wildlife.
- 8) Flooding Normandy is known for its high water table, more buildings and concrete will not help.
- 9) what percentage of new homes will be social housing? We do not have enough in the village. Normandy will lose its appeal as a village to settle in.

A big building plan will be detrimental to the area and should be stopped.

Please stop and consider local Brownsites not Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4876    Respondent: 10790241 / Donatus Prinz Von Hohenzollern    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1214  Respondent: 10790593 / E.A. Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to your letter of the New Local plan which will influence planning decisions in the Borough, and will have a massive impact on East and West Horsley. I wish to object most strongly.

East and West Horsley have always been in the Green Belt and should continue to remain so. Both villages’ roads are overflowing now with traffic schools are full also the doctors surgeries (and the royal Surrey).

We do not need more houses or more residents.

I have objected to these plans before and wish to make even stronger objections again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3408  Respondent: 10790753 / Sarah Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposal of a Secondary school in area A46. You have presented this as an "Exceptional Circumstance" when it has been proven by many means including our SCC Mr K Withams that the school is not needed.

So if the school is not needed the exceptional circumstance does not exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1054  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1052  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1605  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1606  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1607  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3557  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/690  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/765  Respondent: 10793281 / Paul Woodington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Clockbam Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The large number of previous objections made by the local people has been ignored.
- The increase from 45 homes to 60 homes is too high.
• It will make worse the traffic problems in Tannery Lane and at the A247 junction.
• There is already surface water flooding and this will make it worse.
• The open countryside views from the River Way will be ruined.
• The Green Belt in our area has already been eroded and this will worsen the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/767  Respondent: 10793281 / Paul Woodington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43

I object strongly to the Policy A43 change at Garlick ’s Arch because:

The proposed number of 400 homes is excessive. We do not have the schools and medical services large enough to cope with this influx of at least another 800 people.

There is no proven demand for Travelling Show people plots in this location.

Ripley and Send will be joined up.

Thousands of previous objections have been blatantly ignored

It is ancient woodland and needs to be protected at all costs.

It is currently a flood zone 2 allocation and subject to frequent flooding.

Fifty years of shooting has resulted in contamination by lead shot.

The traffic in the area is already excessive, with long delays occurring in Send Marsh Road and Send Road at peak times. The proposed increase in housing will only exacerbate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/771  Respondent: 10793281 / Paul Woodington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to Policy A58 at Burnt Common because:

- There is absolutely no need to build industrial or warehouse development in the middle of the Green Belt. There are empty sites remaining at Slyfield and Guildford.
- Because of all the objections made previously, this was deleted from the 2014 draft.
- The 2016 plan has changed the word "minimum" to "maximum" and since that time there has been a decline in demand for industrial land. In fact, the 2017 Employment Land Need Assessment shows a reduction in demand to 9 hectares for industrial land for the whole borough, NOT a huge over-allocation of 10 hectares at Send in the Green Belt.
- The traffic, which is already too heavy, will be vastly increased.
- The existing villages will be joined up and the Green Belt lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/92  Respondent: 10793281 / Paul Woodington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I strongly object to the proposal to inset Send Business Park from the Green Belt because:

- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
- The vehicular access along Tannery Lane (in both directions) is extremely restricted.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

I sincerely hope that my objections will be sympathetically considered and that common sense prevails. Once the Green Belt has been lost and our beautiful villages spoilt there is no turning back.

The infrastructure of our villages is not able to support a substantial increase in population and traffic. The houses will not be affordable because in this area nothing is affordable. This can be seen by the 5 bedroom executive homes that are built
on any bit of land that does become available. The only people who will benefit from these plans are those who will be involved in the building, thereby increasing their bank balances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1927  Respondent: 10793537 / Mr Michael Pattinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was astonished to read that East Horsley is regarded as a Rural District Centre. There is a variety of shops in the Village centre but no more than might be expected in a rural, not urban, Village of its size. To state that Station Parade has a large supermarket is simply not true. There is a convenience store, Budgens, but it certainly cannot be described as a large supermarket. Furthermore the car parking arrangements in the Village centre are very limited and in the vicinity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1924  Respondent: 10793537 / Mr Michael Pattinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your invitation to take part in the consultation on the Proposed Submission Local Plan. I have considered this carefully and find that there are several aspects that are unacceptable and to which I object.

First and foremost I object to the incursions that are proposed into the Green Belt. Changes to the boundaries of the Settlement Area, development of Green Belt sites outside the Settlement Area and insetting of East Horsley, which is essentially a rural village, all remove land from the Green Belt. This can only be accepted if they are necessitated by exceptional circumstances -which have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8115  Respondent: 10793537 / Mr Michael Pattinson  Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

A very considerable increase (over earlier plans) in the proposed annual number of houses to be built appears to be without evidence of any justification for the need. Any increase of this magnitude would place unacceptable burdens on the local Infrastructure. For example the Horsley Medical Centre is seriously overloaded as evidenced by the difficulty and delay in making appointments to see doctors. This can only become worse if there is a significant increase in the number of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8118  Respondent: 10793537 / Mr Michael Pattinson  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

Vehicular traffic already places great burdens on local roads, in particular Ockham Road which is used by numerous heavy vehicles as a convenient cut through from the A3 to the A246. This should be discouraged since cars or lorries frequently need to mount footpaths in order to pass with consequent damage to gullies, verges and paths which are not designed for such loads and consequently break down. The hazards to pedestrians and cyclists are considerable. Any substantial increase in housing, and therefore residents and cars, will exacerbate an already dangerous situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/1237  Respondent: 10793697 / Norman Carpenter  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
As I mentioned in my previous letter, I had the planning brief on Send parish council for 10 years. In that time my proposal that threatened access problems to or from the property were automatically turned down by the Borough. It seems that policies A42 and A44 ought to follow that rule particularly in their extremely dangerous situations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2252  
Respondent: 10793697 / Norman Carpenter  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to this development relies solely on transport and from it entering or exiting to SEND ROAD via TANNERY LANE. This lane is far too narrow for any extra traffic particularly with Boyes Garage occupying one side of the intersection. Traffic had increased alarmingly down send road particularly heavy lorries and 20-30 training vehicles passing through daily. The latter training lorries always stop in the middle of the villages and block the road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2255  
Respondent: 10793697 / Norman Carpenter  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

This development seems to been added without previous warning.

I OBJECT to the development as it captures even more GREEN BELT as do other policies.

As an ex-resident of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (1968-1989) I was flooded twice and narrowly missed the flood on the third occasion. I realise new flooding relief was constructed remembering that the original flood water came from the 'GARLICK ARCH' side of the Portsmouth road- the building of a concrete town of 400 houses will ensure the accelerated run-off of storm water into the lower 'WIMPEY ESTATE'.

ALL the above development will invariably increase the load on the schools and the medical facilities- already heavily overburdened.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2253  Respondent:  10793697 / Norman Carpenter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this development as it again relies on entry and exit on the SEND HILL an extremely dangerous single lane at this point and the steep hill runs down to effectively a 5 way junction with Potters lane, Church lane and Vicarage- it is renowned for its accidents albeit most have been minor to serious at this date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/4905  Respondent:  10793697 / Norman Carpenter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the following:

I OBJECT to Send Village being removed from the GREEN BELT. It was intended to be a permanent buffer stopping Woking and Guildford being one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1286  Respondent:  10793697 / Norman Carpenter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
<table>
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<tr>
<th>Comment ID: pslp172/1288</th>
<th>Respondent: 10793697 / Norman Carpenter</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td>I object to this development with or without the extra 15 homes. As stated previously, transport to and from it, entering and exiting SEND ROAD via TANNERY LANE. This lane is far too narrow for any extra traffic. Send Road itself is becoming overloaded with heavy lorries on the top of the general traffic. As stated before the 20 – 30 training lorries/day add to this problem.</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<th>Comment ID: pslp172/1278</th>
<th>Respondent: 10793697 / Norman Carpenter</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44</td>
<td>I object to this development (a) on personal experience of the 1968 Flooding (Resident 31 Maple RD (1968-1989) The extra floorspace, concrete, tarmac surface will ensure the accelerated runoff of storm water right to lower “WIMPY ESTATE”, as for the 8 travelling/ show people pitches – [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
My objection to this development has further strengthened since last year, having seen several potential accidents occur at 5 way junction as well as not being able to drive up Send Hill on many occasions due to traffic blockage on the NARROW RD.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3105  Respondent: 10794145 / R.W. Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

REASONS FOR OBJECTION:

1. Site A46 is Greenbelt land. Government policy is to protect the greenbelt. Exceptional circumstances have to be proved in order to justify releasing greenbelt land for development but this has not been done by GBC.
2. The proposal of a new secondary school on site A46 does not constitute those exceptional circumstances as existing secondary schools can accommodate the increase in pupil numbers which might be generated by the proposed housing development. To attempt to justify the housing development in terms of the alleged need for a new secondary school, which in fact is not needed, is a spurious and circular argument in GBC’s plan.
3. Site A46 is a sensitive site of agricultural and ecological value. Other developers have suggested other sites which are less sensitive but GBC has overlooked those in its proposed local plan.
4. The local infrastructure is unable to cope with the consequences of the proposed development in terms of traffic flows. The country lanes which bound it are already overstretched at peak times. From where I have lived for nearly 50 years it is already a risk every time to access Westwood Lane by the single lane under the railway bridge.
5. Also the local infrastructure is unable to cope with surface water and is subject to flooding. Concreting over site A 46 can only exacerbate the problems already existing. Building in a flood plane is not sensible policy.
6. It is a principle of planning (NPPF) that local people have a critical input into planning policy. Why should I and I suggest nearly all the local people of Normandy and Flexford have their views disregarded by a developer-led plan of GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/740  Respondent: 10795553 / Valerie A Chant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I have to hand a letter from yourselves dated 6 October 15, saying quite clearly 'we will need to take account of constraints...[text unreadable] GREEN BELT, FLOODING, LANDSCAPE & INFRASTRUCTURE such [text unreadable] transport...'

At the April 13th GBC Planning Meeting, Normandy I [text unreadable] named as a 'strategic site' when only 6 weeks [text unreadable]. We were assured that this land between Flexford and Normandy had red sensitivity.

I see too that you wish us to have a '60 bedroom Nursing Home'. We want neither the Nursing Home nor the volume of traffic' it would generate. Please stop allowing bungalows to be ruined by building a second [text unreadable] thus rendering them unsuitable for elderly residents who also not wish to leave the village, yet are perfectly able to live alone and have neither need or wish for a nursing home. People who wish for a house should not buy a Bungalow!!!

Retail space? Do not bother. Normandy had many shops but one by one they have closed because everything is cheaper in town or on line.

Transport - have you, in the past few years had a hospital; or other appointment for 9am? Unless you leave Normandy at 7.30 you will be late!

As you can see, I live in the Paddocks, I am disabled, my Doctors Surgery is at the lower end of Glaziers Lane. I have a buggy but dare not try to go to the surgery in this. There is, until past the surgery, only 1 footpath in Glaziers Lane, either on the east or the west side, involving crossing the road twice at the two most dangerous points, one on a blind bend with no lowered kerb, the other close to the north side of the railway bridge where traffic speeding from the south side just does not see you until they are on top of you - oh - the pavement of the north side of the bridge is slipping away and tries to tip you over. The traffic is bad at the moment (sat no directions). We cannot cope with more traffic!

Six traveller pitches - be fair! We already have more than our share - who incidentally, flout your rules constantly.

Secondary School for 1500 students! Why? We all are well aware that the existing local schools are under subscribed. Are they to hold classes overnight? They won't be on time for 9 O'Clock. Extended railway station car park - I suggest an airfield would be more [text unreadable] then there would be much more hope of arriving on time.

1,100 new homes! Choke the Green Belt between 3 Hamlets! I fully realise that people need homes but in the Guildford area there are many other villages, hamlets and areas of scrub land (not nature habitats) that could well share the burden of development. I am also aware that developers want arable land, not scrub land as it is much more profitable, but what happens when oil runs out and food is not so cheap to transport? We shall need arable land.

I am very concerned that these plans were made public so close to the time that we were assured that we were a 'Red Preservation Area' in the Green Belt, forcing us all to believe that negotiations were already taking place with Taylor Wimpey.

Finally, a village green! How dare Taylor Wimpey or yourselves imply that such a thing is necessary, Normandy has a very friendly community and many times during the year we have organised events on our excellent village green, including the excellent children play area. It seems that what it being planned is not just Normandy taking a fair share of development but (considering the meaning of the word 'rape' means inserting a foreign body into an unwilling recipient) the 'rape' of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<thead>
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<th>Comment ID: PSLPS16/742</th>
<th>Respondent: 10795553 / Valerie A Chant</th>
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<tr>
<td>For your letter of 25 May.</td>
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<td>Yes, of course, I wish this letter - (accompanying photocopy) to be a formal response that is passed to the planning inspector considering your proposed plan and to any further planning meeting that may be relevant.</td>
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<td>I do not wish to speak in person but wish my written word to speak for me.</td>
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<tr>
<td>Finally I would like to stress the point that the site in question was not safeguarded so how is it threatened for development:- a 'red' area of the 'GREENBELT - NOT SAFEGUARDED???'</td>
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<td>We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:</td>
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<td>- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion</td>
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<td>- result in rat-running through local roads</td>
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<td>- add to Guildford's pollution.</td>
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1837
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3593</th>
<th>Respondent: 10796417 / Richard Shenton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6894  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6895  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15034  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15051  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15052  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15023  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15026  Respondent: 10796417 / Richard Shenton  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15030  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15056  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15049  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15045  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/15047  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/15054  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15038  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15041  Respondent: 10796417 / Richard Shenton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. My wife and I currently experience considerable traffic congestion on the A247 through Clandon and on the A3 between Ripley and Guildford. Just in recent days this has caused us:
- To be late for work
- To be delayed returning home (including taking 30 minutes to travel the last mile home on the A247).
- To miss appointments
- To get caught in traffic jams on the A3 for routine shopping trips
- To lose a wing mirror, knocked off by a large truck passing through the narrow sections of the A247 in Clandon

The further substantial congestion that would be caused by the proposed developments at Wisley Airfield, Garlick’s Arch and Gosden Hill Farm is unacceptable and unsustainable.

In addition, we strongly oppose the proposed changes to the Green Belt and the insetting of villages. There are no specific exceptional circumstances to justify amendments to Green Belt boundaries. Proposed developments in supposedly protected areas are in breach of party manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15015  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15009  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15012  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These new need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/5072  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
3. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
4. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.
5. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
6. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5073  Respondent: 10796417 / Richard Shenton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever.
2. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches. There is no proven demand for travelling show people plots in this location. The allocation of 28.9 ha is an excessive land grab into the Green Belt.
3. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
4. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
5. Local roads through the villages of Ripley, Send and Clandon already suffer from congestion and the lack of road infrastructure (Policy I1). An example of severe congestion for much of the day is the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The Plan does not provide an achievable strategy for improving capacity on these local roads.
6. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration of the road surfaces and additional parking problems.
7. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians and also bicycles, which have become a serious traffic issue since the Olympics.

8. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

9. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

10. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes.

11. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/5074  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, **is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
5. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
6. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
7. The impact on small surrounding roads will create traffic gridlock.
8. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
9. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
10. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/653  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am appalled at the proposed developments in this area. Surely, the objection of residents should be given more consideration.

How does the council; who were elected in good faith to uphold our green belt and charming villages; presume to over-ride people’s wishes.

I object strongly to all proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Support – a viable site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/388</th>
<th>Respondent: 10798049 / Steve &amp; Maureen Knight</th>
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Support – allotment land needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Object – concerns over width of road, flooding and services

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Object – concerns over access, traffic flow on Saltbox Road and the underlying water table

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/391  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support in principle – housing must include a high percentage of affordable and social housing. Access to new houses an issue if not through Slyfield – other routes out needed in Bellfields. I fully agree with GBC decision not to include the field owned by Cassidy Slyfield in SARP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/392  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support – although needs a new 4 way onto A3, probably meaning the Burpham on/off A3 access will need to be closed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/393  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<td>Support - although traffic flows and volumes in Worplesdon will need monitoring</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Support in principle although I have serious concerns over access to and from the A3 and additional traffic going to Guildford</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support. What about also using the land in Burnt Common between London Road and the A3 for additional development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/397  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object - Some development yes but this is far too much. Access to Aldershot Road and A31 also a concern

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/385  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support - more affordable and social housing needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/841  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support - although the threshold should be reduced to 10 dwellings

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/842  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support and also include all local listed buildings

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/843  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object – I do not support major development in our villages. Our villages must not be inset but remain in the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/844  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
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<tr>
<td>Support – rural economies must continue</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Support in principle although there must be more affordable/social housing, probably with increased density</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The fact that Jacobs Well is a local centre has been omitted and should be added to plan</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Support – more affordable and social housing needed with Guildford young people getting priority. Increase density for first timers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Object - Infrastructure needs to be in place prior to any development starting</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Support – GBC must support A3 changes and work with Highways England prior to considering any major road changes/developments (such as the non-justifiable CLLR)</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Support in principle (so long as any developments do not cross the green belt or flood plains)</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Support in principle but Hogs Back beauty should be preserved</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Object – I do not agree with insetting of villages or the widespread abuse of the green belt. The villages should stay in the green belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Object – I am totally opposed to building on flood plains and not taking due regard for water courses. Flooding remains a constant risk in our area and will be worse if uncontrolled building occurs. In the local plan AECOM has high-lighted some key areas including SARP</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/856  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support in principle but the Waddenzee judgement must be applied

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/840  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been through the Guildford Local Plan and have the following high-level comments to make:-

Infrastructure must come first and delivered in the appropriate order. Due cognisance must be afforded to the work being undertaken by Highways England with regards the A3 prior to any other major roads being considered (such as the CLLR). As part of any infrastructure work constant monitoring of air quality must be paramount as Guildford has a poor record in this area.

I am also concerned that with so many new homes being planned, detailed studies are undertaken to ensure that services such as sewage, water and power are adequate to support the growth. Obviously we must build new homes where viable but GBC must ensure that a high proportion of these new homes are affordable or social housing to ensure that our young people can live in the borough.

GBC must pay due regard for the green belt, our environment and the preserving of AONB. I am totally opposed to the insetting of our villages (e.g. Jacobs Well) and removing them from the green belt.

GBC must also pay due regard and preserve our flood plains. They are there for a purpose and have served Guildford and Surrey well for hundreds of years. There should be no building of houses or roads on designated 3B flood plains or building
in areas where the water tables and streams will be affected. It should be noted that AECOM high-lighted SARP as a project with significant flood risk.

With regards the many traveller pitches in the plan, for Guildford Borough, GBC must ensure that DCLG Planning Policy for Traveller Sites (August 2015) is applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/423  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/427  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/478   Respondent: 10798145 / Jane and Derick Fulcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have read the objections and comments made by the East Horsley Parish Council and agree with their observations. We however wish to add the following:

- We object to any building on good quality green belt, which was set up in the first place to provide open spaces for recreation and to enhance residential areas.
- Effingham Junction station, which is nearest to our house, is exceptionally busy in "rush hour" indeed the car park is full. Trains are very congested.
- The M25 which would provide access to other areas for work by any new inhabitants, is normally at a standstill in the rush hour period. The A3 north to London in rush hour is very full. The A3 by-pass round Guildford needs enlarging.
- The local school - The Howard of Effingham - may be moving to a new site and we understand doubling in size. Some 3000 pupils we understand. Surely this really is too large as the local roads have enough difficulty delivering the current number of pupils to the school. So new schools and roads will be required. Will the proposed primary school/secondary school at the Wisley proposed development be adequate?
- With house prices being what they are in the local environment will the teachers be able to acquire accommodation?
- Will new build house prices be capped so that new joiners to the housing market can afford them?
- There appears to be no provision for council houses.
- The Royal Surrey is our local hospital - it is working at full stretch. So are Frimley and Epsom. A new hospital is required.
- There is a totally inadequate local bus service.
- The local roads are inadequate for the proposed developments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1704   Respondent: 10798369 / Gail Hollis   Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed development of Gosden Hill, Blackwell Farm and Wisley Airfield. The requirement for this number of houses has not been disclosed and is therefore in my mind grossly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1709  Respondent: 10798369 / Gail Hollis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed development of Gosden Hill, Blackwell Farm and Wisley Airfield. The requirement for this number of houses has not been disclosed and is therefore in my mind grossly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3286  Respondent: 10798369 / Gail Hollis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses on Clockbarn Nursery because of the inadequate access and traffic volume. Tannery Lane is a quiet single lane country road and is far too narrow and bendy to take any more traffic. The traffic volume has increased dramatically since the Business Park has grown and it is very dangerous. I have seen six cars backing up each way to get around a bend on many occasions. The junction to Send Road is also extremely hazardous for vehicles trying to access the main road. Planning permission has been granted for 64 homes on the Tannery Site and a new Marina both of which will generate heaving traffic.
There are also bats on the site which are a protected species. We also see Lapwings and Cuckoos every Spring and early Summer. All these endangered species will disappear. Every winter we get flooding in our garden, so badly that we have to pump out the water to stop incursion into the house. Building on this area will increase this risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3289  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the new interchange on the A3 with Burnt Common because Send would have to take the traffic from the proposed 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Barns Lane and Send Road are already overloaded, and quite often gridlocked during the morning and evening peak hours. This is would make this road impossible and would increase pollution and noise levels, which are already excessive. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3309  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford's housing needs have been grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3310  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the new interchange on the A3 with Burnt Common because Send would have to take the traffic from the proposed 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Barns Lane and Send Road are already overloaded, and quite often gridlocked during the morning and evening peak hours. This is would make this road impossible and would increase pollution and noise levels, which are already excessive. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3308  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and two travellers' sites on land opposite Winds Ridge on Send Hill. It is an inappropriate development because the road is a single width country road providing insufficient access. The site was previously land- fill and contains documented unsafe landfill waste registered with Guildford Borough Council. Any development will spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7258  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Send, Ripley and Clandon being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. The Green Belt around the three villages provides an essential buffer stopping Guildford and Woking becoming one huge suburb. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7278  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send, Ripley and Clandon being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework and there are no special circumstances to justify abandoning it. The Green Belt around the three villages provides an essential buffer stopping Guildford and Woking becoming one huge suburb. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2631  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery Tannery Lane, Send, because:

a) There is an increase of 33% in the number of homes from 45 to 60. This is far too many for this rural area.

b) The traffic along Tannery Lane and at the junction to the A247 (Send Road) is already very busy during rush hour. The increase in houses and therefore traffic will make it intolerable

c) Severe water surface flooding will be made even worse.
d) It will have a greater impact on the countryside views from the River Wey.

e) Hundreds of previous objections from local people seem to have been ignored

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10798369 / Gail Hollis</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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I object to the Policy A43 Change at Garlick's Arch because:

1. a) It ignores all the thousands of previous objections made by local people
1. b) It will generate excessive traffic that will block the local roads in Send and Ripley
1. c) There is no proven demand for Travelling Showpeople plots on this location
1. d) It will cause over development of our village and the number of homes is excessive
1. e) It is a beautiful permanent Green Belt and no "exceptional circumstances" exist
1. f) It will join Ripley up with Send and defeat the object of the Green Belt
1. g) It is an exquisite ancient woodland that existed in the time of Elizabeth 1
1. h) It is subject to frequent flooding and is currently in a flood zone 2 allocation
1. i) The land has been contaminated by lead shot for over fifty years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/2632</th>
<th>Respondent: 10798369 / Gail Hollis</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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</table>
I object to Policy A58 Land at Burnt Common Send because:

1. a) It had been deleted from the 2014 draft There Local Plan because of all the objections previously made.
1. b) There are empty sites and industrial units at Slyfield and Guildford therefore there is no need to build warehouse or industrial development in the middle of the green belt.
1. c) The impact on the small surrounding roads will be intolerable and create traffic gridlock. It is like this most of the time anyway especially if there are problems on the A3 or M25.
1. d) The employment land Need Assessment (2017) shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares in Send on the Green Belt.
1. e) The word "minimum" is a change from the previous "maximum" in the 2016 plan and since then there has been a decline in demand for industrial land.
1. f) This over development will join up existing villages and defeat the object of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1065  Respondent: 10798369 / Gail Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

1. a) There is highly restricted vehicular access along Tannery Lane in both directions. The lane is very busy at peak times and will become worse
1. b) Further expansion or development at this location detracts from the openness of the Green Belt and is totally inappropriate
1. c) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation canal and the Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1917  Respondent: 10798913 / Michelle Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of East Horsley village and have been for the past 9.5 years. My husband and I moved out of London because we wanted to live in the countryside and wanted our children to be brought up in a quiet village without the pollution, noise or close proximity of others as you would expect in a town or city.

It has been brought to my attention that Guildford Borough Council have put forward an amended Local Plan proposing to build over 2000 houses on Wisley Airfield, nearly 600 new houses in East and West Horsley and to take East and West Horsley completely out of the Green Belt.

I do not agree to any proposal to take the Horsleys out of the green belt. It is essential that green belt land is maintained at all costs for the sake of flora and fauna. The beauty of the Horsleys is the countryside that surrounds it. It is vitally important to protect the beauty of our green land and the natural habitats it protects. Wisley Airfield is on your Guildford Borough Sites of Nature Conservation Importance and is therefore one of the areas you have promised to protect from Developers. I understand that the "exceptional circumstances," required before taking this action have not been met.

I further object to any attempt to extend the settlement boundaries of the Horsleys or to the re designation of the Station Parade as a District Centre.

In my view it is not possible for the existing infrastructure in the villages of Ockham, West and East Horsley to accommodate the increased volume of housing proposed. In particular:

1. The villages have narrow roads which will not accommodate constructions traffic and traffic from the increased population.
2. The rail services are already strained with commuters having to stand to Waterloo on certain trains.
3. Existing problems with flooding and sewerage systems will be exacerbated.
4. The doctors' surgery will not be able to cope with any increased population numbers.
5. The local school in West Horsley could not accommodate any further increases in population. I also object to the proposals being made for a new primary school to be built on existing green belt land.

Please do not go ahead with any of the proposals for new housing in the Ockham, West and East Horsley villages as this will only destroy the character of the villages I love so dearly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the unfair imbalance of the Plan across the borough.

Whilst I recognise that each Borough has a responsibility to provide housing I object to the way that the plans have become biased against the north east of the Borough. This has been achieved as a result of the removal of site A46 from the Plan (1100 houses) and reductions of housing planned in this version of the Plan in other parts of the Borough. Guildford Borough is over 100 square miles. Of the 11,350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Ripley, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the Borough.

Equally importantly, the north east of the Borough is not a major source of employment and does not have good transport links, public or otherwise. It is therefore inevitably that already congested road infrastructure will become even more crowded with resultant environmental issues — something which will effect existing and new residents alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1185  Respondent: 10798977 / Ian Brooks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4 and A44) from the Plan

Faced with an excess of housing planned for the Ripley area I am unable to understand why site A4 in Guildford has been removed from the Plan. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail — thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to:

“have adopted a ‘brownfieldfirst’ approach” (page 5)

but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1183  Respondent: 10798977 / Ian Brooks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch’

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

Moreover, the inclusion of the site A55 Burt Common, removes the need for A43 Garlick’s Arch). The Borough Council’s reasons for including Garlick’s Arch A43 in the 2016 Plan were:

a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [than the Burnt Common site did ]”
b) The site [A43] provides the employmentfloorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore the Borough Council is not following their own guidelines and objectives. There is no justification for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1186  Respondent: 10798977 / Ian Brooks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/235  Respondent: 10798977 / Ian Brooks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

1) to hide the number of houses actually being built (A24, A25, A26 — total of 1100 deferred, but still being built!); and ii) give an excuse for building houses on another site (A43 — 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/234  Respondent: 10798977 / Ian Brooks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that:

“Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:

“Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes. Moreover, in my time in Ripley, I have seen the results of the Borough Council’s laxness on affordable housing whereby a developer was allowed to increase the number of bedrooms in the houses he was building with the result that potentially affordable houses became too expensive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/233  Respondent: 10798977 / Ian Brooks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D1 Making better places**

PART SUPPORT, PART OBJECT

We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.
There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18387  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**PART SUPPORT, PART OBJECT**

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There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/342  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
POLICY D2 Sustainable design, construction and energy

Generally OBJECT The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18388  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Generally OBJECT The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/343  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D3 Historic environment

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18389  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/344  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 Development in urban areas and inset villages

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E1 Meeting employment needs

OBJECT because

• the evidence base is unreliable
• there is unclear differentiation between B class uses
• only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
• industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E2 Location for new employment floorspace

OBJECT: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY E2 Location for new employment floorspace

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E3 Maintaining employment capacity and improving employment floorspace

OBJECT I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18381  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/336  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5 Rural economy

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/18382  Respondent: 10799169 / Neal Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/337  Respondent: 10799169 / Neal Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 The leisure and visitor experience

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18383  Respondent: 10799169 / Neal Basson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/338  Respondent: 10799169 / Neal Basson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18384  Respondent: 10799169 / Neal Basson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/339  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 District centres

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18385  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 Local centres

OBJECT We do not think that retail development adjacent to the 6 rural centres is appropriate., nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**POLICY H1 – Homes for all**

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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POLICY H2 – Affordable homes

OBJECT. “Affordable” homes, under national definitions means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18373   Respondent: 10799169 / Neal Basson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/18374  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/321  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Village facilities

The infrastructure of the West Horsley, as well as East Horsley cannot support a potential effective doubling of the households and residents.

The villages are extremely rural in character. East Horsley has one public house, a church, a hotel, very few shops, and not one state school. The two boys only private schools already produce significant traffic problems at each end of the school day on Ockham Road North and the A246.

Secondary school places are limited at the Howard of Effingham School and other secondary schools are a greater travelling distance from the village.

West Horsley alone includes no less than 41 listed buildings, some dating back to the 15th century. West Horsley has one shop, no post office and one highly over-subscribed school.
The single medical centre shared between East and West Horsley is similarly over-subscribed and residents have difficulty in getting appointments. Such a massive increase in population as proposed would stretch this service to beyond breaking point. The planned population increase for the Borough would also mean a major extension of the Royal Surrey Hospital to allow it to cope.

Parking facilities are extremely limited in the shopping areas of East and West Horsley, as well as Horsley station. The impact of such a large increase in population as proposed would overstretch these facilities. It would make it difficult if not impossible for many of the older and less mobile inhabitants to reach the shops, and most importantly the medical centre and chemist.

**Roads**

Traffic generation from the proposed development would be considerable, with most households having two cars, many with three.

The Street, which constitutes the only entry to West Horsley from the A246, is very narrow, and it would not be possible to widen it. This road is already often perilous, particularly when large lorries, buses and tractors pass through. To increase such traffic, which would result if the proposed developments were to proceed would be wholly irresponsible.

**Transport**

- West Horsley’s bus service through the village is extremely limited and only operates two/three times per day Monday to Friday.
- The bus service running from Guildford to Leatherhead travels along the A246 at the southern end of the village and is really only of use to residents living within a maximum of eight to ten minutes walk from the bus stops at the Bell and Colvill roundabout.
- Parking at Horsley station is limited and sometimes full on a weekday. There is no land to create additional parking for the increased need that the proposed expansion would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/345  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY II Infrastructure and delivery**

OBJECT Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration.
Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18391  Respondent: 10799169 / Neal Basson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/346  Respondent: 10799169 / Neal Basson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY I2 Supporting the Department of Transport’s “Road Investment Strategy”

OBJECT This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18392  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/347  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 Sustainable transport for new developments

OBJECT We support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered.

It is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process – the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle –and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a three hour commute add one hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18393  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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It is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

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While we welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/323  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Impact on Areas of Outstanding Natural Beauty**

The impact of the proposed housing estates would be to blight the surrounding areas of outstanding natural beauty. Many of the proposed sites are so close to such areas that it would no longer be appropriate to refer to these as such, as they would become reducing areas of green countryside, surrounded by urban sprawl.

Most of the areas proposed for potential developments are contiguous with AONB and it is my understanding that statutory protection is afforded to areas contiguous with AONB.

**Impact on Wildlife**

The impact on wildlife in the Horsleys would be devastating. In my own garden, I have had grass snakes, hedgehogs, weasels, toads and deer and have observed red kites and woodpeckers. These species would be under threat form loss of habitat, and in some cases, predatory cats, the population of which would increase with the proposed rise in homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/348  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY I4 Green and Blue infrastructure

OBJECT The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18394  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

The Council needs to completely rethink its priorities and very carefully consider the views and requirements of the borough’s residents. We need a less contentious and more viable plan, which proposes a sustainable and suitable level of development. The use of brownfield sites should be high on the agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/329  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

OBJECT This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18375  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/320  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms.

I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

**Policy P2: Green Belt Status**

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents, which will be evidenced by the number of letters you have already received on this subject, plus a petition and strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.

- Amongst other relevant factors, the National Framework states:
- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another; and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.

- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.
- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I write with regard to the above. There are proposals to put 70% of the new housing on either Green Belt or on countryside beyond the Green Belt - i.e. most of the new homes are not being put on urban brownfield sites. To do this, will require the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

Taking my local villages of East and West Horsley as examples, the plan indicates 533 new houses. This will completely change the character of the area forever, which is unjustified and unnecessary – like the vast majority of the overall plan.

Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms.

I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

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- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

Village facilities

The infrastructure of the West Horsley, as well as East Horsley cannot support a potential effective doubling of the households and residents.
The villages are extremely rural in character. East Horsley has one public house, a church, a hotel, very few shops, and not one state school. The two boys only private schools already produce significant traffic problems at each end of the school day on Ockham Road North and the A246.

Secondary school places are limited at the Howard of Effingham School and other secondary schools are a greater travelling distance from the village.

West Horsley alone includes no less than 41 listed buildings, some dating back to the 15th century. West Horsley has one shop, no post office and one highly over-subscribed school.

The single medical centre shared between East and West Horsley is similarly over-subscribed and residents have difficulty in getting appointments. Such a massive increase in population as proposed would stretch this service to beyond breaking point. The planned population increase for the Borough would also mean a major extension of the Royal Surrey Hospital to allow it to cope.

Parking facilities are extremely limited in the shopping areas of East and West Horsley, as well as Horsley station. The impact of such a large increase in population as proposed would overstretch these facilities. It would make it difficult if not impossible for many of the older and less mobile inhabitants to reach the shops, and most importantly the medical centre and chemist.

Roads

Traffic generation from the proposed development would be considerable, with most households having two cars, many with three.

The Street, which constitutes the only entry to West Horsley from the A246, is very narrow, and it would not be possible to widen it. This road is already often perilous, particularly when large lorries, buses and tractors pass through. To increase such traffic, which would result if the proposed developments were to proceed would be wholly irresponsible.

Transport

- West Horsley’s bus service through the village is extremely limited and only operates two/three times per day Monday to Friday.
- The bus service running from Guildford to Leatherhead travels along the A246 at the southern end of the village and is really only of use to residents living within a maximum of eight to ten minutes walk from the bus stops at the Bell and Colvill roundabout.
- Parking at Horsley station is limited and sometimes full on a weekday. There is no land to create additional parking for the increased need that the proposed expansion would bring.

Drainage /flooding

The land between Silkmore Lane and Ripley Lane is frequently subjected to such serious flooding that Ripley lane becomes absolutely impassable several times per year. This land slopes significantly towards Ripley Lane, and during periods of sustained rainfall, flooding always occurs. Severe flooding also frequently occurs on The Street, East Lane, and Long Reach, to the extent that these roads, and in particular the hill under the railway line often become impassable.

This is also the case in the road where I live – Green Lane. There is already an under-capacity of existing drainage, sewers and treatment works to cope with heavy rainfall. When heavy rain does occur, the water in the toilets in our house rises alarmingly, and the drains and sewers flood the road and our garden, requiring several visits from the water company to clean and sanitise the ground. The current infrastructure is unable to deal with the requirement.

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The impact of the proposed housing estates would be to blight the surrounding areas of outstanding natural beauty. Many of the proposed sites are so close to such areas that it would no longer be appropriate to refer to these as such, as they would become reducing areas of green countryside, surrounded by urban sprawl.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/330  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3 – Countryside (i.e. countryside beyond the Green Belt)

OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. I think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18376  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/322  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Drainage /flooding

The land between Silkmore Lane and Ripley Lane is frequently subjected to such serious flooding that Ripley lane becomes absolutely impassable several times per year. This land slopes significantly towards Ripley Lane, and during periods of sustained rainfall, flooding always occurs. Severe flooding also frequently occurs on The Street, East Lane, and Long Reach, to the extent that these roads, and in particular the hill under the railway line often become impassable.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/331  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4: Flood risk and water source protection zones

OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18377  Respondent: 10799169 / Neal Basson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/332  Respondent: 10799169 / Neal Basson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P5: Thames Basin Heath Special Protection Areas

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FURTHER COMMENTS AND OBJECTIONS ON SPECIFIC POLICIES:

POLICY S1 – Presumption in favour of sustainable development

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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POLICY S2 – Borough Wide Strategy

OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18371  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/489  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PART SUPPORT, PART OBJECT We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings. There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/498  Respondent: 10799169 / Neal Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT because
- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/496  Respondent: 10799169 / Neal Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp171/495</th>
<th>Respondent: 10799169 / Neal Basson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. “Affordable” homes, under national definitions means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place.

OBJECT Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/483  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT We support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered,
It is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.
How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process – the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle –and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a three hour commute add one hour to their journey from using park and rides?
The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/502  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
DO YOU CONSIDER THIS SECTION OF THE DOCUMENT; COMPLIES WITH THE DUTY TO COOPERATE? ( ), IS SOUND? ( ), IS LEGALLY COMPLIANT? ( )

ANSWER (IF COMMENT IS ON QUESTIONS 1-7 OF THE QUESTIONNAIRE): ()

OBJECT
This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

WHAT CHANGES (2016)/FURTHER AMENDMENTS (2017) DO YOU SUGGEST SHOULD BE MADE TO THE DOCUMENT?

ATTACHED DOCUMENTS:

Comment ID: pslp171/509  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I write with regard to the above. There are proposals to put 70% of the new housing on either Green Belt or on countryside beyond the Green Belt - i.e. most of the new homes are not being put on urban brownfield sites. To do this, will require the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development.

Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

Taking my local villages of East and West Horsley as examples, the plan indicates 533 new houses. This will completely change the character of the area forever, which is unjustified and unnecessary – like the vast majority of the overall plan.

Therefore, I object to Policy P2 and the other policies as referenced below in the strongest possible terms.

I have outlined below why this is the case based on my specific local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents, which will be evidenced by the number of letters you have already received on this subject, plus a petition and strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.
Amongst other relevant factors, the National Framework states:
- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.
- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings.
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.
- Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/500  Respondent: 10799169 / Neal Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT .There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7932  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 ABSENCE OF POLICY ON RIVER WEY

**We object** to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

1.1.1 It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;

1.1.2 The special character of the landscape and townscape in the corridor is protected or improved;

1.1.3 Views both within and from the corridor which contribute to this special character are protected or improved;

1.1.4 Where appropriate, public access is provided to and along the River and the Navigations.

1.1.5 The Nature Conservation value of the site is protected or improved

2 GREEN BELT SITES

**We object** to ALL Green Belt sites allocated for development in the local plan

We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints.

The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013.

This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent:</th>
<th>10799425 / Guildford Greenbelt Group (Susan Parker)</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**We object** to policy A25 Gosden Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt, the site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.

If this development proceeds WE believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

WE object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPS16/7934  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**We object** to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.
1.1.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

1.1.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

1.1.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities.

The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB.” We question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils.

Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic.
through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital.

We question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” We consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7935  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy A35 Wisley

We object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”. 2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

4. Proximity to A3/M25 bottleneck and Ripley village and roundabouts. 5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7936  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A42 Clockbarn Nursery

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location

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would not be sustainable. The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/7937  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**We object** to policy A43 Garlick’s Arch

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. We object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt.

Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached. We object to the development at Garlick’s Arch because of flood risk.

The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well we are aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. We object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013.

There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available. We object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
We object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. We object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested.

Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. We object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. We have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. We have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network.

The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. We object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health. We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7938  Respondent:  10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities.

There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would now be through Burnt Common and Send.

Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common.

This will cause immense damage to those areas on small roads which cannot be improved.

We object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7939  Respondent:  10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to policy A44 Send Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring. The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development. A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties. The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons. On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required.

The date of the landfill works predates the 1999 EU Landfill Directive regulations. We therefore believe that there is a danger that any disturbance would be a health hazard due to the unknown materials. GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge. A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations.

We therefore believe that there is a danger that any disturbance would be a health hazard due to the unknown materials. A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”.

This causes concern as to what it does contain and the dangers if disturbed. An Envirosrch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This land is located with land parcel H12 as identified in GBCS Vol IV. The land is DEFRA agricultural land Grade 3A and has been farmed traditionally for pasture (sheep and cattle) and for grain (wheat and barley) in perpetuity. The land
contains many stands of scheduled Ancient Woodland. It is contended that the land contributes to the ‘openness’ of the Green Belt between the settlements of Flexford and Normandy and should remain ‘washed over’ by the Green Belt.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases:

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Guildford Borough Settlement Profiles (July 2013) & Settlement Hierarchy (May 2014)

We object to the use of a 2010 survey of parishes that was not represented to parish councils as to be part of the Local Plan evidence base in an attempt to present the two settlements as one so as to better suit the pre-determination evident in the council officer's thinking even at this early stage in the consultation. It is recognised in the Settlement Hierarchy that Flexford and Normandy are separate settlements, neither rank highly based on their individual sets of community facilities and services (Normandy 13, Flexford 27 sustainability ranking in Settlement Hierarchy report). It is disingenuous to represent them as a combined community. The ward contains five hamlets in a dispersed area. There is no traditional community centre. The incorrect assessment in the Settlement Profile document has been pointed out under Regulation 18 consultation but the council continues to include this flawed document as evidence. It should be discounted and removed from the evidence base.

Use of educational provision as “exceptional circumstances”

We object to the proposed site of Normandy/Flexford (Policy A46) for a new Secondary School; this should be rejected as the need for such a school in the location has not been proven.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford." Why has GBC not heeded this advice?

Every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied. The birth rate which rose in 2011 and 2012 has reduced for the last two years, so building new schools now is a mis-direction.

GBC in the Infrastructure Delivery Plan, May2016 indicate that SED 3, IDP p87, a 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site, requires only 1 FE to serve the development site itself, the remaining capacity would serve the wider area, including Blackwell Farm site (Policy A26). However, given that the proposed
Blackwell Farm development is for 1,800 dwellings, on a pro-rated basis of children of secondary school age within the arising population, this would only require a maximum of 2FE. Together, the Blackwell Farm site and the Normandy/Flexford site require only an estimated 3 FE provision. The proposed school is excessive in size, being more than twice as large (7FE) as the estimated need (3FE), and as other information provided here indicates, this is well within the funding and expansion capabilities of existing schools in the western wards of Guildford borough and the western side of the town.

The addition of forms of entry [FE] to current schools will be a much more cost effective and sustainable in the long term if there is a reduction in need – an empty classroom is cost neutral in terms of annual budgets, but an empty school is unsustainable, having spent millions of Pounds of Department of Education capital budget creating it, it would be a huge waste of money.

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms – but they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to co-operate with a programme to expand that school, as had the Principal at Kings College - although now undersubscribed significantly, if it needs expansion in the future there is space and a willingness to do so.

If GBC wishes to proceed with this proposal, SCC Education Officers need to demonstrate a clear and undisputed need for such a school at this location, given the current under-subscription of all the neighbouring local secondary schools surrounding Normandy.

It should also set out how such a new school will be financed. If not, the site should be rejected.

Undersubscribed Secondary Schools

Kings College, Guildford

The school is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. Kate Carriett, Principal at Kings College has said very clearly: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College is fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

Christ's College, Guildford

This school is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity

Ash Manor, Ash

The capacity of the school is 1,050 and it has 940 pupils, so is undersubscribed by 110 places. The Head Teacher and Chairman of Governors are quoted as saying that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy, just three miles from their front door, and the possible negative effects on Ash Manor.

Connaught School

This is near Ash, just over the County Boundary in Hampshire - but is also undersubscribed by 90 places and available to Surrey children.

Hoe Valley Free School, Woking.
This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

Consequently, there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. In addition to those, SCC has already approved expansions at the County School, Guildford and St Peters.

The birthrate in Guildford has fallen over the past two years and whilst it’s too early to know if that trend will continue, it is another factor to urge caution, and not to proceed at this time.

The case for a new secondary school in Normandy is therefore not proven. If there is such a need elsewhere in Guildford Borough, we don't believe it is needed in the location proposed at Normandy.

Contribution to the Purposes of the Green Belt

We object to the express overriding by GBC of the contribution the land proposed for Policy A46 makes to the 5 purposes of the Green Belt in response to a developer-led proposal for large-scale house building in the Green Belt.

The evaluation of the ‘land parcels’ in and around Normandy and Flexford is laid out in the tables in GBCS Vol 4. The ‘land parcel’ that contains the land proposed for Policy A46 is H12, evaluated against 4 purposes of the Green belt it performs as follows:

- Checks sprawl of Normandy and Flexford
- Prevents Flexford and Normandy from merging
- Assists in safeguarding the countryside from encroachment

Guildford Borough Council recognises the contribution the land surrounding and within the settlements of Normandy and Flexford makes to the five purposes of the Green Belt in identifying land parcels H10, H12, H13, H14, H15, H16, J16 and J17 of particular sensitivity in its re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1.

Contribution to ‘openness’ of the Green Belt

We object to the express rejection by GBC that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt.

In the case of Normandy and Flexford, there have been two planning appeals concerning Gypsy pitches (Palm House Nurseries and Green Lane East) where the inspector agreed that land near Flexford and land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that the land around Normandy and Flexford is considered by the Planning Inspectorate to exhibit ‘openness’. A third more recent decision at appeal for housing development at North Wyke Farm found that the land contributed to the “openness” of the Green Belt.

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

Impact on Surrey Hills AONB

The land designated as AGLV and identified as 12-1 in the Map AONB Boundary Review - Recommended Areas for Consideration and pp28-29 AONB Area of Search Evaluation - Natural Beauty Evaluation, Oct 2013 report to be added to
the Surrey Hills AONB reinforces the proximity of valued landscape as it will add the north slopes of the Hogs Back overlooking Flexford settlement to the very boundary of Flexford settlement at Flexford Road.

Further, the land allocated in Policy A46 contains unrestricted view of the Hogs Back, part of the Surrey Hills AONB. Recent case law establishes that views out from open land to an AONB are as important as views into land overlooked by an AONB. Surrey Hills Management Board (of which GBC is a member) has submitted proposals to Natural England for land currently with local designation Area of Great Landscape Value on the north slopes of the Hogs Back above Wanborough and stretching down to Flexford Road at the southern boundary of Flexford settlement to be subsumed into the AONB and is currently awaiting ratification. The future potential presence of in excess of 1,000 houses visible at the periphery of the AONB with associated urbanising infrastructure (e.g. roads, perpetual street lighting, general light pollution, loss of ancient hedges and trees etc.) would do great harm to the views into the AONB from the land between Normandy and Flexford and from the Surrey Hills AONB.

Therefore it is concluded that ‘land parcel’ H12 is Green Belt land that contributes to the ‘openness’ of Normandy and Flexford settlements also contributes to the ‘openness’ of the surrounding country side and adjacent Surrey Hills AONB. Consequently, both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

Thames Basin Heaths SPA

We object to the assertion that the creation of SANG will protect the rare ground-nesting bird species on this SSSI and Natura 2000 site from major disturbance and predation introduced by the building of 1,100 dwellings that give rise to hundreds of adults and children, vehicles, dogs and cats within 1 kilometre of this internationally important wildlife habitat. Policy P5 is concerned mainly with how to support large scale housing development in close proximity to the SPA than with protecting wildlife habitat and biodiversity. It fails to address appropriate Monitoring Targets for unregulated vectors of disturbance generated from large-scale housing development within the 400m-5km mitigation zone.

Natural England is the government agency that champions the conservation of wildlife throughout England. They have advised the eleven local authorities with land in the Thames Basin Heaths, that new housing within 5km of the SPA may harm the rare bird populations. Larger developments located between 5km and 7km of the SPA may also be affected. This harm can be caused by disturbance to the birds from a growth in the number of walkers, cats and dogs frequenting the heathland, and other recreational uses created by additional housing.

The 2012/13 visitor survey report commissioned by Natural England on behalf of the Thames Basin Heaths Joint Strategic Partnership Board showed not a static or falling number but a 10% increase in visitor numbers since 2005:

- 66% cited dog walking as the main activity
- 80% of interviewed groups had dogs
- 67% of interviewed groups had dogs which were seen off lead
- 39% specifically visited the SPA site was because it was ‘close to home’
- the average distance travelled was just over 2.5 kilometres (80% by car)

Only 1% of visitors accessed the TBHSPA from the Normandy/Flexford direction, so the additional disturbance caused by the building and then occupation of 1,100 homes by 2,000-3,000 residents and 1,250 additional vehicles will be significant. Importantly, the prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA.

Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? This would be more compelling evidence. Without it, a planning inspector has no means of finding the proposal of large-scale housebuilding at these sites sound. In response to an email from NAG, Natural England have admitted that no survey evidence exists of the effectiveness of SANG or SAMM programmes in directing dog-walkers away from TBHSPA in Guildford borough or any of the surrounding local authorities.
A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Creating 1,100 homes on Green Belt land between the settlements of Normandy & Flexford implies, on average, 340 dogs and nearly 290 cats; all housing to be located within 1 kilometre of the SSSI; for a dog owner, a 2-minute drive or 10 minute walk away.

The proposed SANG schedule in the Infrastructure Delivery Plan, May 2016 (IDP, SANG 13 p84) gives indication of neither the physical size nor location of bespoke SANG for Policy A46 (LAA Site 368); it is estimated that this proposed open space will be unable to cater adequately for 340 additional dogs plus their accompanying owners and there will be significant ‘leakage’ onto the TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7941  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1  Policy A47 – Land west of The Paddocks, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant?  NO

Do you consider this section of the plan is sound?  NO

Do you consider this section of the document complies with the Duty to Cooperate?  YES

We object to the proposal that the land that contains the majority of an SNCI should be proposed for housing development.

The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently…..” This is a quote from point 7 of the section dealing with achieving sustainable development, in the NPPF.

In the section headed “Conserving and enhancing the natural environment” (section 11), it is stated inter alia that planning policy should protect and enhance valued landscapes and minimize impacts on biodiversity providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…..”.

Guildford Borough Council (GBC) interprets the NPPF through their ‘Policy I4′ which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)".

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Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.

Policy 14 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that an SNCI should be considered a suitable site for development, particularly given the statements in the NPPF (Para 109) and Policy 14. We find it a telling insight into the very low value that GBC places on biodiversity and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7942</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A49</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A49: Land rear of Palm House Nurseries, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO

Do you consider this section of the plan is sound? NO

Do you consider this section of the document complies with the Duty to Cooperate? YES

We object to the “insetting” of the land proposed for Policy A49. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. We propose this land should continue to be “washed over”.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances” for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Contribution to ‘openness’ of the Green Belt

There is no legal definition of ‘openness’ but it is specifically expressed in NPPF para. 79 that appears as the first paragraph in “Section 9 Protecting Green Belt Land”; ‘openness’ is matter of opinion and that opinion is often expressed in the decisions of Planning Inspectors when assessing a planning appeal.

In the case of Palm House Nurseries the inspector agreed in 2011 that land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that this land around Palm House Nurseries is considered by the Planning Inspectorate to exhibit ‘openness’.

Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011

“Openness

1. The Secretary of State agrees with the Inspector’s assessment of the impact of the proposals on the openness of the Green Belt at IR99-100, and his conclusion at IR101 that there would be considerable harm in this respect. For the reasons given at IR101, the Secretary of State also agrees with the Inspector's conclusion that the development would result in some limited harm to one of the five purposes of including land in the Green Belt identified in PPG2, namely that of assisting to safeguard the countryside from encroachment (IR101).”

Green Belt & Countryside Study, Vol. 4

In the Green Belt & Countryside Study Vol 4, Land parcel H10 that contains the Palm House Nursery site was judged the fulfil three essential purposes of the Green Belt

1. Checks sprawl of Normandy
2. Prevents Normandy, Wood Street Village and Flexford from merging
3. Assists in safeguarding the countryside from encroachment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A50 Whittles Drive, Guildford Road, Normandy

Response – GGG objects to this policy

Do you consider this section of the plan legally compliant? NO

Do you consider this section of the plan is sound? NO

Do you consider this section of the document complies with the Duty to Cooperate? YES

We object to the “insetting” of the land proposed for Policy A50. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. We propose this land should continue to be “washed over”.

Legal Precedent

We object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84. We believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. We draw attention to the following cases

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In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

We contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17538  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
We object to Policy D1 Making better places. We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**We object** to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/17541</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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**We object** to policy D4 Development in urban areas and inset villages

**Summary**

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, not can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within
Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.

- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

**Urban development**

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;”....
There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

- The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
- Important views of the village from the surrounding landscape;
- Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the
removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans...... and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

“...Some might argue that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans...... and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“......That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that
the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

• According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
• The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
• Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that
part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
• In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states

“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years. GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

◦ 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
◦ 500 homes at North Street
◦ 1000 homes on current GBC car parks (25 acres) and at the station
◦ 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
◦ 1000 homes at Slyfield on the 40 ha regeneration site
◦ 1000 windfall infill (50 per annum)
◦ 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

Annexe in relation to Green Belt Study:
Critique Update: Revisions to Green Belt and Countryside Study

Pegasus Study: Vol IV (dated 17/04/14)

Changes to this volume (Volume IV, which deals with insetting of villages) were made because of earlier criticisms of the study, particularly with regard to Effingham. Changes were summarised as follows:

• “Re-consideration of how woodland / tree belts etc impact upon openness of the villages in Green Belt terms;
• Reference has been removed to the specific development footprint calculations, due to the complication previously generated in the interpretation of such data; and
• Re-consideration of the appropriateness of insetting Effingham, due to part of the settlement lying in adjoining authorities.”

In this revised version, a three stage approach was still used and the stages were given as:

“Stage 1: Assessing the degree of openness within each village through analysis of urban form, density and the extent of developed land;
Stage 2: Assessing the surroundings of, and potential new Green Belt boundaries at each village within Guildford Borough; and
Stage 3: Assessing the suitability of each village for insetting within the Green Belt and defining potential Green Belt boundaries.”

There is a very slight change to the wording of Stage 2, but no change of any substance to these 3 stages between the original and the revised version. However, in this new version the only reference to the previous method used in stage 1 was to justify the removal of

“the specific development footprint calculations, due to the complication previously generated in the interpretation of such data.”

The only complication was created by Pegasus using the data they generated in a bizarre way. As the previous critique showed Pegasus was interpreting their data incorrectly, so they have simply dropped any reference to it. However, this was at least an attempt to show objectivity in their methodology. This means that the entire revised process became subjective and opaque. As this is such a controversial and important topic – the removal of villages from the green belt - this type of methodology is simply not acceptable. The data that was previously generated pointed towards different conclusions from the conclusions drawn by Pegasus – and this was probably the real reason for the data being excluded in a revised report.

A fair and robust methodology would ensure that anyone else performing the same task would get the same or very similar results, and this is best achieved by using objective methods that are visible and transparent. However, if different independent groups were set the same assignment using the methodology employed by Pegasus, because of the subjective nature of the tests, it is highly unlikely that the same conclusions would be reached. For an undertaking of such importance, the methodology used was entirely inappropriate and so the results from this study are unacceptable. The data that was previously generated pointed towards different conclusions from the conclusions drawn by Pegasus – and this was probably the real reason for the data being excluded in a revised report.

Although Pegasus claimed the methodology was changed, previous results have not changed – in other words, their conclusions have not changed. Consequently, the criticism of the methodology previously used still stands. Methodology used in Stages 2 and 3 has not changed and the previous critique is still valid for these stages.

The “new” methodology for Stage 1 in this later issue of Volume IV is discussed below.

Stage 1 Assessing the degree of openness within each village through analysis of village form, density and extent of existing developed land
The map used to illustrate this is exactly the same as that previously produced, with the same areas marked out, so it is not reproduced here – it is in the earlier critique. In this stage Pegasus use (as before) the concept of “perceived” village area, to justify the inclusion in the “perceived” village area of housing that is in Mole Valley – but they have not included any open areas such as Rolls Farm to be within the “perceived” village area. In fact, their concept of perceived village area is one that would be created only by viewing the area from space, or using aerial maps without boundary markings, with a determination to include as many buildings and as little open farmland as possible. On the ground, the boundary between Guildford Borough and Mole Valley is clearly marked, along the A246. So “perceived village area” is clearly a very subjective concept.

In this revised report, Pegasus have attempted to justify their subdivision of areas into high, medium, low housing densities, as well as open areas, and their definitions are given below, with relevant paragraph numbers:

“13.13 Through site survey, aerial imagery and detailed OS base mapping at 1:5000 scale, areas of high, medium and low development density were identified within the village area. Such categorisation assumes development associated with a village, rather than other areas, so for example, high density areas identified would not be classed as high density within a town or city environment. The areas were defined as follows:

• High Development Density – generally includes areas of flats, terrace, detached, semi-detached or singular buildings within densely distributed clusters with enclosed street frontages, small scale garden plots enclosed by fencelines, hedgerows and other buildings. Built development forms the dominant characteristic;
• Medium Development Density – generally includes areas of detached, semi-detached or singular buildings within closely distributed clusters within medium scale garden plots, small holdings, open spaces or small fields. Built development is the prevalent characteristic interspersed with visible open areas; and
• Low Development Density – generally includes singular detached buildings that are sparsely distributed within large garden plots, country estates or open farmland. Open areas form the dominant characteristic interspersed with infrequent buildings.

13.14 Once areas of high, medium and low development density had been mapped, detailed comments regarding village form, density and openness were identified and annotated on the Stage 1 assessment map using a 1A, 1B, 1C, etc prefix.”

Pegasus persisted in not providing a numerical guide to housing density, which would be a normal approach when attempting to classify densities. This means they can classify areas in any way they see fit, without regard to actual densities. They have deliberately chosen not to use an objective approach, which would be numerical. This is evidence for an approach with a predetermined outcome – Pegasus avoided using numerical data even when it is a standard approach for this type of analysis.

However, an analysis of several areas will serve to illustrate the nonsense in their application of this classification – some analysis was given in the earlier critique and this is still valid, but more details are given below, starting with the first area, 1A, described as

“High density two storey detached residential development located on Effingham Common Road within medium to large scale garden plots enclosed by Thornet Wood to the east.”

Figure 1. Area 1A “High Density” Housing on Effingham Common Road

The Google earth snip shows that this description is a fantasy – the houses are not enclosed by Thornet Wood, Thornet Wood is 190m approximately north from the end house of the 6 houses. The boundary to the west is Effingham Common Road with the end house (Meadow Cottage) facing the rear garden of the first house in Leewood Way. To the north is open farmland, bordered by Thornet Wood, 190m approximately north of the other end house, Terriston. To the east is open farmland, Effingham Lodge Farm. To the south is St Lawrence playing field and another field, all open and undeveloped. The single storey St Lawrence school building is 183m to the south.

The actual density is easily calculated. The 6 houses are set in an area of 1.73 acres (0.7 ha) so the calculated density is 3.5 houses/acre, or 8.6 dwellings/ha. Under no circumstances could this be considered as high density, or as enclosed. The description provided by Pegasus was inaccurate and can best be described as a fantasy, developed to ensure a predetermined conclusion was reached.
Area 1K. “High density two storey detached and semi residential development located on Orchard Gardens, Mount Pleasant, Norwood Road, Norwood Close, Strathcona Avenue, Woodlands Road and Links Way. Properties located within small scale garden plots enclosed by fencelines, hedgerows and buildings.”

Figure 2. Area 1K: “High Density” Housing

The area shown is 23.9 ha, 59.1 acres, and has approximately 434 buildings in total, predominantly residential but including several commercial buildings. Thus the density is 18.2/buildings ha, or 22.7/acre. This density is lower than being put forward in Effingham’s Neighbourhood plan by the Parish Council, and much lower than developments in villages given planning permission by GBC during 2013/14, at 71 dwellings/ha. So although high by comparison to most of the rest of Effingham, density in this area would be considered low to medium by current standards. The highest housing density in the Berkeley Homes proposal was 31.2 dwellings/ha, and this was described as low density.

The north eastern boundary of this area is the A246, but across that road are the open areas of Browns Field, King George V playing fields and recreation area, as well as (to the west) an open field on Rolls Farm. The southern boundary is open farmland, and the western boundary Effingham golf course. This means that even in this area, there is a sense of openness and connection with the green belt beyond the village, which is obvious in the Google earth snip given in Figure 2.

Note the disparity between these two areas, both described by Pegasus as high density – in area 1A, the actual density is 8.6/ha but in 1K is 18.2/ha. Even in their contrived categorisations Pegasus were not consistent.

Finally, a third area, to further illustrate how poor and subjective this analysis was – area 1I, housing on Manorhouse Lane.

Area 1I “Medium density single and two storey detached residential development on Manorhouse Lane with medium to large scale garden plots enclosed by hedgerows and treebelts to the east of King George V playing fields.”

There are 8 houses in this area, an area of 1.53 ha, 3.8 acres, so that the density is 5.2 houses/ha, or 2.1/acre. Pegasus would have had to come from a strange parallel universe to believe that this could be described as medium density housing. To the north, the boundary is a hedge beyond which is the extensive gardens of Manor House school; to the east the boundary King George V playing fields. Spring gales showed just how fragile the treeline in this (and other areas) is – one tree was taken down by the gale and another felled as it was unsafe. To the west is the lane, and beyond the lane, open farmland. The short southern boundary is the A246. So this area is not enclosed, there is a very strong connection to the open green belt beyond the houses – and their hedges.

Figure 3 “Medium Density” Housing on Manorhouse Lane

Of the 14 areas defined on their stage 1 map, Pegasus identified 3 as high density – but again without any numerical definition of high density. Analysis above shows how misplaced these definitions were. 7 areas were classed as medium density – and again, an example above shows how misplaced these were. Three areas were classed as low density, and just one as open farmland. Note that Browns Field and King George V playing fields were classed as low density. A detailed analysis of all areas should not be needed to show that in many cases (if not all) the categorisation was wrong. But in the parallel universe occupied by Pegasus, three areas defined as high density were enough to decide that the whole of the perceived village area exhibited a high density of development. This was a conclusion that even George Orwell’s Ministry of Truth would have found questionable.

It was wrong because Pegasus had an outcome in mind, and mere facts were not going to prevent their fixed conclusion from being reached.

In the Stage 3 insetting criteria, the only change was that the reference to the calculation of the built area was dropped, no doubt because this was clear evidence of bias in their analysis. No other changes were made, so that the “score” remained the same – one plus and two negatives for Effingham, so they were able to reach the conclusion that Effingham should be inset. Pegasus did inset a suggestion that this should be done only after consultation with the neighbouring Local Authority, Mole valley District Council. No notes of any such meeting have been provided.

The actual position remains the same as in the earlier critique – Effingham is an open village, with a great deal of open space within the village. There are strong connections to the green belt beyond the village and so the village makes an important contribution to the openness of the green belt.
In reaching the conclusion that Effingham should be inset, Pegasus had to totally ignore reason and fact, and produced a report that was shameful in its bias. It is highly likely that this same bias was evident when recommending other villages should be inset into the green belt, so that the real contribution other villages make to the openness of the green belt is unknown. Preconceptions throughout this report are evident, and the kindest thing that can be said about it is that its determination to ignore facts in order to reach the destination of fixed conclusions is heroic. However, it is a discreditable report, and it should have no place in the Evidence Base that informs the Local Plan process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17529  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response

We OBJECT to this policy.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).
What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, we are concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

We have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

**B1**

**Business**
B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),
(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

**General Industrial**

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

We also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield. We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses.
So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start-up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

We object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17530  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We OBJECT to this policy as it stands. We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.
The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby.

Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations. A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17531   **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**We object to Policy E3 maintaining employment capacity**

We do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

**Full response**

- We believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
• Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
• To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
• To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
• London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.
• Guildford is in dire need of increasing town centre residential development
• The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.
• We regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence
• In relation to the targets and monitoring indicators, we do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##(see the feasibility study dated December 2015 – although other proposals may be put forward (e.g.by Hounslow))## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.
Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will be taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increases in vehicle speeds is only desired in the morning. Going home from work does not seem to matter !

Annexe 2

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators :

Page 1957 of 3142
Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17532  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.
- Monitoring indicators should include new start-ups and new patents created.
- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.
- We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.
- We do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park.
• The Surrey Research Park currently extends to 65,000 sq m
• There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker
• The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
• The ELNA 2015 calculated annual floor space demand is 0.7%
• The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
• The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35,000 sq metres of additional employment land are not justified by the evidence base.

We regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17533  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E5 Rural Economy

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.
It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

• Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building
within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in
conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17534  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic parts of High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors of the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP, supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy that could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest.
are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist in the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience.

Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed).

This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important local industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall. It notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle, held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey...
organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive that building a house is “Growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish. http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map. The guide to the locality from the NT (see web link incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. http://www.nationaltrust.org.uk/es/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches and dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.

Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. This appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development , 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/17535 | **Respondent:** | 10799425 / Guildford Greenbelt Group (Susan Parker) | **Agent:** |
|-------------|----------------|----------------|-----------------------------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 | **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) | **is Sound?** | ( ) | **is Legally Compliant?** | ( ) |
| **Answer (if comment is on questions 1-7 of the questionnaire):** | () | **We object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.** |
The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing’ in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and we consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retail space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data.
Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m² gross (see Appendix 6).”

This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford

Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25

Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game’s 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?

The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underline all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential
We do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. We consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17536  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We object to policy E8 District centres  We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring.

The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17537  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Policy E9 Local centres

We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17519  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan.

In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks).

If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17520  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy H2 Affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17521  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants.
These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes.” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

**Paragraph 4.2.30**

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.  

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website.

**Figure 1. Comparison of Average House Price Increases**

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.
Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

Paragraph 4.2.31

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

Paragraph 4.2.32

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an
affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
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<tr>
<td>Waverly</td>
<td>13.7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td><strong>Guildford Borough</strong></td>
<td><strong>10.89</strong></td>
<td><strong>11.94</strong></td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.
Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph3. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

**Paragraph 4.2.23**

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

**Annexe 1**

**Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011**

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses4, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

**Table 2 Census Data for Guildford Borough**

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
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</thead>
<tbody>
<tr>
<td>GBC</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
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<tr>
<td>Population</td>
<td>129,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
</tbody>
</table>
Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

**Table 3 Land Registry Property Prices in Guildford Borough**

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
</tbody>
</table>
The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 is shown in graphical form in Figure 1, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.”

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Figure 2 also shows that the median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.

**Figure 2 Property Transaction Prices in Guildford Borough**
A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 3, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

**Table 4 Housing Transactions in Guildford Borough, 2015/16**

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>£100,000</td>
</tr>
<tr>
<td>183</td>
<td>£200,000</td>
</tr>
<tr>
<td>713</td>
<td>£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>£400,000</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

**Factors that Affect House Prices and Affordability**

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

- The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the
governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.

Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.
Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2

Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said
“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

“This ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

Sustainability

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report9 that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Areas in London exceed the EU limits for various air- borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being...
recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17522  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Detailed Traffic Comparisons**

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 1. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”.

The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/ Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

**Table 1  Comparison of availability of cars or vans**

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effingham (Parish)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
<tr>
<td><strong>Woodbridge Meadows, Walnut Tree Close and the Station</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.

Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations.

Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 2. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford.

Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here.

This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

**Table 2 Comparison of Methods Used to Travel to Work in 2011**

<table>
<thead>
<tr>
<th>Travel to Work, 2011</th>
<th>Effingham</th>
<th>Woodbridge Meadows, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or by bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by public transport</td>
<td>15.5</td>
<td>28.9</td>
</tr>
</tbody>
</table>

**Conclusions**

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these uses instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17523  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
We object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states: "In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate". This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

**Paragraph: 034 Reference ID: 3-034-20140306**

*Can unmet need for housing outweigh Green Belt Protection?*

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

**Revision date: 06 03 2014**

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list., This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.
One particularly shocking – developer led – initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:… limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting… local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17542  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to policy I1 Infrastructure and delivery

We OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. This is underlined at the end of the Policy wording which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Some infrastructure, as identified in Figure 1 of the draft IDP- is within the control and remit of Guildford Borough Council – they have some influence in relation to planning – but much is under the control, and is the fiscal responsibility of, Surrey County Council or Highways England.

It is not realistic to assume that car use can effectively be replaced for all or even many users. Those who are disabled or infirm cannot easily substitute car journeys with bike travel: the elderly; the disabled; those caring for young children (particularly uncertain bike users and those with multiple children to care for); those wishing to use cars for supermarket or other bulky shopping; those who wish to commute to work and have no facilities for showering or changing on arrival; those who have lengthy and tiring commutes at present, for which the car is the final (short) element of a long journey (for those commuting into London from outside Guildford, a daily 3 hour commute is typical; this cannot realistically be extended by extensive cycling). All these factors mean that the replacement of the car with cycle use is likely to be overstated by many studies, particularly given narrow roads which do not allow effective or safe bike lanes.

Funding is not the only - nor the main - obstacle to improving infrastructure within the borough, and this seems not to be recognized. Guildford is a gap town, set in a bowl within the Surrey Hills Area of Outstanding Natural Beauty to the south of the borough, and with large sections of the borough affected by the Thames Basin Heath Special Protection Area to the north. There is a ribbon through the middle of the borough which contains rail and road links to London, but is already heavily congested, is Green Belt, AONB, SPA or more than one of the above. Very little of the borough is available for extensive development of infrastructure or any building. Do we really want solutions that involve driving new roads through our remaining countryside – including the AONB – at huge cost in financial and environmental terms. Such solutions may be the only ones left when the inadequacies of this proposed Local Plan are realised after the event.

Policy indicates note an intention to pool Community Infrastructure Levy from most new build development and to use CIL receipts to assist in provision of infrastructure needed to support the delivery of the plan. As with other aspects of planning, there is a failure to recognize that out of town settlements in particular have particularly high requirements for additional new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits.
In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but we have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.

We are not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

Planned developments for Guildford and Waverley Boroughs were modelled together but growth for the rest of the UK was allowed for only using the DotT forecasts. As a result it is not clear whether adequate allowance has been made for significant developments planned for Woking and other neighbouring Boroughs. This represents an inconsistency in approach with the West Surrey SHMA.

Many of the results for the PM peak are missing (TA 4.1.11 states that “these can be set out in an addendum report at a later date”). We believe that those who need to travel on the roads in peak hours will be every bit as interested in their future journeys home as they are for going to work. Publication of the Transport Assessment was delayed until the start of the consultation period so perhaps the non-inclusion of many PM results was simply a result of running out of time.

The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

We are not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.

It is noted that the infrastructure Development Plan was developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.

The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level
of growth in the local plan. **Congestion will worsen.** The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17543  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

Funding for prospective road improvements has not been secured.

The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

The Road Investment Strategy phase 2 (RIS2) for the period post 2020 is currently in the research stage. Until the research is completed it is impossible to prejudge what impact this will have on the Strategic Road network. However, the Strategic Transport Assessment does state “4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.” and “4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets.” Also, at 4.8.3 “At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1.” In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan.

It is possible or indeed probable that no further funding will be available, or that any funding will not meet projected full costs. If this funding is unavailable in full, then this policy should clearly state that projects cannot be developed.

**RECOMMENDATION:**
We propose that unless guaranteed public funds are available to cover costs in full, there should be no development of any individual sites of more than 10 homes outside the urban areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17544  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to policy I3 Sustainable transport for new developments This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

We support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.
Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do. This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL...
regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

**Detail in Policy wording – flawed drafting:**

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7,8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.
Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.
Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

**Annexe 1**

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow #[]see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably
because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

- Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Response type: OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

“The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11)

“As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

Part of the problem is that “Biodiversity benefits are unpriced” and so not valued by those who look only at the more obvious and simplistic economic benefits.

We have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.

These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.
As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated that “The Council is keen to protect the watercourses from inappropriate development that would spoil their character”. The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development – well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.

That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to which this policy refers largely describe existing open space, which is of great importance. But to determine not to utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would seem to be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the town, and that this should not be held up pending yet more transport studies (Guildford’s track record on brownfield utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the “parkland” along the River Wey will take but the images available in the Town Centre MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards this we have yet to see the GREEN AND BLUE INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative) – management of open spaces and lanes

We await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 has been omitted.(We think this meansP5 – more evidence of slapdash work)

4.6.38 We agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Responses to definitions:
This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

We support the use of green roofs and walls.

However, building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

4.6.45 Our understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints and harassment of Skylarks by out-of-control dogs.

In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist. Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough).

4.6.46 We welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 We welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer?

**Reasoned Justification:**

4.6.50 As the emerging strategy for Surrey and the Green and Blue Infrastructure Supplemenary Planning Document (GISPD) are not yet available the plan should not be proposing sites that will be jeopardised. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity.

**KEY EVIDENCE**

Guildford Borough Policy Statements are statements – not evidence.
Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

**MONITORING**

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

SANG delivery is harming existing biodiversity

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but we see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?

How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

We believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
We object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst the Guildford Greenbelt Group welcomes the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which we consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they...”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, GGG is also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

GGG believes that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

• “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
• “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
• In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, GGG would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.
It has been noted that CPRE have proposed alternative wording for the AONB Policy 1 in their own submission, and this wording would be a more appropriate protection for the AONB than that offered in this current policy wording.

As this stands, the wording is far too weak and does not comply with the requirements of the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17513  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We request that the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. A spokesperson (not a councillor) will be pleased to speak in respect of this issues. We request that once all objections are fully taken into consideration the draft plan is amended accordingly and re-issued. Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. We are concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target **without any application of constraints** as required under the National Planning Policy Framework and the National Planning Policy Guidance. The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done. The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. We are concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. In our opinion much of the proposed local plan appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17525  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood contro
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

We are deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17526  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined
by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

• “requires a countryside location or where a rural location can be justified, and
• is proportionate to the nature and scale of the site, its setting and countryside location, and
• does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17527  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**
We object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design.

Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented.

It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We OBJECT to this policy. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.
We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include:

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).
“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17517  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

2008
This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years.

It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing.

At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. The use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately **500 homes per annum** would appear to be a correct estimate of OAN for Guildford. However, **this is before constraints** are applied to arrive at an acceptable housing target.

A further study is attached which is included within this section by reference. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. We have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in **exceptional circumstances**, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17518  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ministerial guidance in relation to building on the Green Belt is clear:

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
2. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014
70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Guildford OAN Review.docx](44 KB) [Guildford OAN Review.docx](44 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence base is not up to date or adequate.

The documents of the evidence base were subject to continuous change without notification and it has been impossible in some cases to track the changes in order to identify significant and material change, making it impossible to evaluate if the change makes the document adequate or relevant. The evidence base was and is not ready for public consultation if there is no way to track what was said previously in so many documents of the evidence base, therefore no basis on which to judge adequacy and relevance to the current draft local plan.

For example, GBCS Vol 4 tables of scores for the contribution of each land parcel to the five purposes of the Green Belt showed one basis of evaluation in the version published in February 2013 and where this failed to support the pre-determination of GBC, the basis of evaluation was changed in the version published in April 2014 reducing the perceived Green Belt protection of the land parcels, making it easier to argue for their qualification as land for housing development. This does not make the document up-to-date as the basis of measurement and evaluation has changed; this is ‘moving the goal posts’ not improving ‘up-to-date-ness’.

The Habitats Regulation Assessment and Sustainability Appraisal were released after the plan was approved by the full council on 25 April 2016. The lateness and content demonstrate the inadequacy with which this plan has dealt with environmental matters. Neither document was immediately available on the website, so early responses sent to the council before these were released could not have taken account of the environmental issues. The Sustainability Appraisal is written by a commercial development company with worldwide reach AECOM and fails to be critical in any way and the document reads more like a public relations release.

The draft SHMA for Guildford has been proved inadequate. A study of the work of GL Hearn in compiling the housing forecasts to provide Objectively Assessed Need [OAN] by NMSS (sponsored by Guildford Residents Associations indicates shortcomings in methodology and lack of rigour in assessing available ONS statistics and misinterpretation of market signals. Therefore, any Policy that claims its content as evidence for the Policy is immediately thrown in to question and suggests it is unsound.

The Settlement Hierarchy evidence has been changed three times, with a second questionnaire submitted to Parish Councils to better record available services. Attempts to conflate settlements as defined by 2003 Local Plan settlement boundaries into small, medium and large villages was abandoned after the methodology was revealed by residents for the sham it was. The transposing of the new questionnaire content has been poor, with errors remaining. Now that the new data fails to match the pre-determination required by the council, the evidence has been quietly shuffled aside and not referred to in detail in the current draft. However, it remains in the evidence base.

The whole process has been one surrounded by obfuscation, with residents having to resort to Freedom of Information requests to obtain essential information freely released by other LPAs e.g. what constitutes ‘exceptional circumstances’. This does not bode well for the Proposed Submission Local Plan to be submitted for examination in public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1983  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Key parts of the evidence are missing, flawed or based on withheld assumptions. We consider therefore that it is questionable as to whether the Local Plan meets all legal requirements.</th>
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<tbody>
<tr>
<td>The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.</td>
</tr>
<tr>
<td>The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.</td>
</tr>
<tr>
<td>The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.</td>
</tr>
<tr>
<td>It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1986  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:</th>
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Answer (if comment is on questions 1-7 of the questionnaire): (No)

<table>
<thead>
<tr>
<th>The plan focuses on growth and economic strategy, to the detriment of social equity and environmental protection as required by the NPPF.</th>
</tr>
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<tbody>
<tr>
<td>Despite the DCLG encouraging ‘brownfield’ registers and ‘brownfield’ land release for housing, there is no ‘brownfield first’ policy. GBC is a major holder of ‘brownfield’ land in the town (Walnut Tree Close and Woodbridge Meadows) and yet has included none of these sites for housing development; Policy P4 is not a sound basis for such an exclusion.</td>
</tr>
<tr>
<td>The plan is inconsistent with the NPPF guidance, as 70% of house building is proposed in the Green Belt.</td>
</tr>
</tbody>
</table>
GBC has included no details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has failed expressly to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1984</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We consider that the Local Plan is unsound. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction. We consider this makes the plan undeliverable and unsound.** We believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum. After **application of constraints the target should be in the range of 250 homes** per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural...
Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective.

Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1987</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound.

**We propose** it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033.

**We propose** it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed.

**We are** concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

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GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1988   Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

GBC has failed to take account of the creation of 3,800 dwellings in the Aldershot Urban Extension [AUE]. Aldershot is the source of many employees for retail and health sector jobs in Guildford. Many choose to commute into Guildford by car along the main routes between the two towns (A323, A324, A31). Apart from a passing acknowledgement of traffic data in the vehicle movement simulations, there appears to have been no attempt to acknowledge the impact of AUE or attempt to synchronise development schedules or combine approaches to central Government on infrastructure developments with Rushmoor Borough Council that would affect all Guildford’s western wards. Simply ignoring Rushmoor BC because GL Hearn deem it not to be in the same strategic housing market is perverse. The Hart, Rushmoor and Surrey Heath SHMA 2014 carried out by Wessex Economics states that the major outward commuting flows are as follows:

- The largest outward commuting flows from Rushmoor are to Surrey Heath, Hart, Guildford, and Waverley. There are significant in flows of workers to Rushmoor from Surrey Heath and Guildford.
- The largest proportion of Surrey Heath’s residents commute to Rushmoor and Guildford. There are in flows of workers to Surrey Heath from Hart, Rushmoor and Bracknell Forest.”

Woking BC covered in the same West Surrey SHMA as Guildford has recently concluded a £6million funding for part of its affordable housing requirement to be built in Rushmoor under the Duty to Cooperate, obviously considering Rushmoor to be of strategic significance and being willing to work with this neighbouring council. Not so Guildford BC and this omission will have a serious impact in western wards as AUE is built out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1989   Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. We assert there is unproven demand for an 8FE secondary school within the western wards of Guildford and therefore, we wish to present the statistical evidence for that assertion at the Examination in Public.

2. We assert that Policy A49 is unsustainable in its current form and open to challenge. NPPF para 83 & 84 require the council to define in the local plan documentation available for consultation the “exceptional circumstances” required under to change the Green Belt boundary; this is affirmed by the following legal judgements:

NPPF 83

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- Carpets of Worth Limited v Wyre Forest District Council (1991)
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

and therefore, we wish to present our arguments at the Examination in Public for this site to continue to be ‘washed over’ by the Green Belt, because if this land were ‘inset’, it would create an island of urban land with no connection to similar land

1. We assert that the disregard of the contribution to the “openness” of the Green Belt made by the land parcels H10, H12, H13, H14, H15, H16, J16 and J17 identified as of particular sensitivity in the GBC re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1, is in direct opposition to observations confirming the “openness” of land around the settlements of Normandy and Flexford made by planning inspectors during consideration of planning appeals in three cases as follows:

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision 14 July 2015

and therefore we wish to make our representations concerning these observations by PINS inspectors in opposition to GBC disregard of “openness” of these land parcels at the Examination in Public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17515  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We consider that the vision underlying this Local Plan is inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.

- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.

- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

**Spatial Vision**

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.
A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m³ for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.” [1]

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in
such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km2) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km2) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi- level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher
levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report[2] was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400.

According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report2, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from
0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debatable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).”

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.

Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services
provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

1. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

1. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

1. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

1. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

1. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

1. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

1. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

1. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

1. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.
1. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

1. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

1. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally we also object to policy A44 West Ridge and Send hill. Again this site is new, not included in the regulation 18 draft and not previously consulted on. This is high quality Green Belt land. The subsoil of the site contains documented land fill waste and is vented, making it totally unsuitable for development. Access is completely insufficient. Please reject these proposals they are unwanted, unnecessary and have zero local support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/16  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object, GBC have failed to provide sound evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/17  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I object GBC have not followed correct process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/18  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object. sound evidence has not been provided

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/19  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object, GBC has been most uncooperative even underhanded with Send residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/20  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the way this whole DLP has been handled with no respect of local opinion and badly arrived at conclusions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/942  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of Burnt Common our area has been threatened with irreversible and excessive development on all sides completely destroying what is left of our rural landscape.

I object to policy A42 change at clock barn in Tannery Lane because;

there has been a 33% increase in planned new homes from 45 to 60 ignoring hundreds of previous objections and adding to traffic congestion at the a247 junction. Contributing to increased surfaced water flooding which already exists. It will impact on the countryside surrounding the river wey navigation and it is greenbelt land which should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/943  Respondent: 10799489 / Shai Sinai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 garlick's arch;

once again, thousands of previous objections have been ignored and again there is no demand for so many houses or travelling show peoples plots at this location. This land is permanant green belt, and no exceptional circumstances exist for development. It is prime agricultural land and contains ancient woodland that has existed since tudor times. Again, this area is prone to frequent flooding and contaminated by lead shots accumulated over 50 years. Living in Burntcommon Lane, we will be massively effected by this excessive development and planned new junction to the a3, massively increasing traffic in our area. Once again, this is green belt land that should not be built on, this will also join send and ripley into one continuous inhabited area, defeating the purpose of the green belt in seperating our villages.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/944  Respondent: 10799489 / Shai Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy a58 at Burntcommon;

it was deleted from the 2014 draft because of objections but now has been re-added to the plan. along with garlick’s arch which previously replaced it. Even worse, the word minimum has been changed to maximum, despite a decline in demand for industrial land. Why plan an industrial development in the middle of the greenbelt, when Slyfielf and Guildford still have empty units? The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not an excessive allocation of 10 hectares at Send, once again, this is green belt land and should not be built on. The increased traffic caused by this development and the Garlick’s arch development and the new a3 junction will choke our village to death with congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/105  Respondent: 10799489 / Shai Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2 at paragraph 4.3.15;

I object to the proposal to inset Send Business Park from the green belt because there is highly restricted vehicle access along Tannery Lane, which is very narrow. This is an area of outstanding countryside adjacent to the beautiful rivery wey navigation and once again this is another attack on the green belt, which is inappropriate and should be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/5844  Respondent: 10799585 / Mandy Grealis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am formally writing to express my concerns and objections to Keens Lane (site A22) inclusion in the draft GBC Local Plan for the proposed development of 140 homes and a care home.

Keens Lane is a narrow road and could not cope with the additional 140 plus vehicles, perhaps more in this age of two cars per family! Widening of the lane would be difficult due to already congested surrounding areas. What (if any) plans do GBC have to ensure better and safer traffic conditions?

The Worplesdon area is surrounded by common and woodland, some of which are sites of scientific interest and an abundance of wildlife. The open nature of Worplesdon should be kept safe. Areas for families and children to discover nature and relax are becoming less and less with more emphasises from councils on making money and securing businesses and less on community, family and welfare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/539  Respondent: 10799809 / Judy Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan proposal to allow a travellers site anywhere in Send as there are so many young people trying to live in send that it would be wrong to give space to people who have not contributed to the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/537  Respondent: 10799809 / Judy Simpson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have objections to the local plan and I want the Planning Inspector to be seen by the inspector.

I object to the local plan proposal to remove Send village from the green belt. It is important for the next generation to know what a village is, and what the green belt is.

I object to the local plan proposal to build so many houses in Send & Ripley area on green field sites as there are still quite a few brown field sites that could be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/538  Respondent: 10799809 / Judy Simpson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan proposal to build so many houses in Send & Ripley area. Of course some new houses are required but Send and Ripley seem to be taking a disproportionate share of Guildford borough’s target and this feels unfair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/668  Respondent: 10799873 / John Todd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register my strong objection to this proposed development

The roads which will service this development already struggle to cope and when there are any incidents on the A31 and the area is used as a diversion it becomes a complete nightmare, Westwood Lane has a low bridge restricting the height of large vehicles and Glaziers Lane has a railway bridge which frequently shows a crack across the brow, quite aside from the extra load it would put on the A323, clearly you have never seen the traffic hold ups that are common with the smallest problems.

The footpaths are non existent in places and where they do exist they are in such a poor state of repair both underfoot and overgrown with foliage.

My drive along with many others has correct drainage but frequently floods because the main drainage cannot cope. I have recently reported what I thought was a water leak as water is bubbling up through the surface but the water board ensure me that it is merely surface water bubbling up, and you are considering putting a huge further stain on the already poor drainage.

The doctors are buckling under the strain, you have to give notice of an illness due to the time it takes to get an appointment much the same as the Royal Surrey hospital.

The area has been registered as green belt and you already allow travelers to set up unauthorized sites and then give up any enforcement regardless of the effect on existing residents and rate payers.

If police are seen in the area the assumption is that they are lost as they are so under manned how on earth would they cope with this increase in residents.

This type of development would turn a nice rural area into a sprawling area similar to Park Barn.

Clearly in even considering this you have no regard for existing residents.

It would be very easy to go on and on but I realize that people very quickly switch off to objections and disregard them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3273  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/3274  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the figure of 693 houses per annum in the borough being too high (Appendix D)**

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6406  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6405  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6407</th>
<th>Respondent: 10800065 / David Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13436</th>
<th>Respondent: 10800065 / David Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13428  Respondent: 10800065 / David Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13434  Respondent: 10800065 / David Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1).

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13435  Respondent: 10800065 / David Thompson  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13433  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13426  **Respondent:** 10800065 / David Thompson  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2037 of 3142
I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/13430</th>
<th>Respondent: 10800065 / David Thompson</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to development in areas at risk of flooding (Policy P4)
The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/13423</th>
<th>Respondent: 10800065 / David Thompson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I object to the local plan as the development proposed is not sustainable

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. I live in the hamlet of Hatchford and the narrow and winding Ockham lane route to Cobham is not suitable for any increased use by the additional cars set out in point 6b.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The initial proposals for development of the Former Wisley Airfield proposed a bus route from the development to Cobham via Ockham Lane. This appeared ill thought out with no regard to the safety of walkers and cyclists along the route.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the draft Local Plan for the following key reasons:
7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

Comment ID: PSLPA16/1234  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have 4 key reasons for objecting to these plans:

I OBJECT TO THE LACK OF SOUND EVIDENCE BEHIND THE LOCAL PLAN

• I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly dubious. These include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area. This is even before the EU referendum result, which will inevitably impact on demand for housing in the area.

• I OBJECT to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.

• I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1455  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO THE LACK OF SOUND EVIDENCE BEHIND THE LOCAL PLAN

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- **I OBJECT** to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.
- **I OBJECT** to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- **I OBJECT** to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Guildford draft plan and its impact on the villages of Send and Ripley. In particular I object to plans a25, A35, A42, A43, A43a, and A44. There are many reasons for objecting to each plan individually, but in fact they should be considered as one entity since they will have a detrimental effect on the villages in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2616  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I OBJECT to Policy A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose. As a resident, I am amazed that there hasn’t yet been a serious accident as drivers use Potters Lane for just this purpose with little regard for the 30mph speed limit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7500  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5870  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the proposed developments opposite Winds Ridge (policy A44) and Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. The first of these will increase the traffic leaving Send Hill onto Potters Lane at what is already a dangerous junction on very narrow lanes. Meanwhile, Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16712  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO THE IMPACT ON THE INFRASTRUCTURE AROUND THE VILLAGES

- I OBJECT to the impact of the Local plan on the local infrastructure. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead. The plans to improve the A3 are years off (2025 – 30) and, even if they were implemented, would be preceded by years of gridlock on the local roads. Plans to improve local roads (ref LRN20, specifically Send Road and Send Barns Lane) through an investment of £1.5m will be woefully inadequate to cope with the increased traffic. Additionally, increased traffic through the villages will increase the hazards along the main roads, particularly pedestrians, especially children (using the Send School or catching buses to Guildford schools) and the increasing number of cyclists. This will be exacerbated by HGVs accessing the planned industrial units at Garlick’s Arch.

- I OBJECT to Policy A43a (Land for North facing slip roads to/from A3 at send Marsh/Burnt Common) This would necessitate a 4-way junction at Burnt Common and would inevitably increase the amount of traffic using the local roads in Send. This junction would worsen the problem of drivers using Send as a cut through from Guildford to Woking on local roads that are just not intended for this purpose. As a resident, I am amazed that there hasn’t yet been a serious accident as drivers use Potters Lane for just this purpose with little regard for the 30mph speed limit.

- I OBJECT to the proposed development of Gosden Hill Farm (Policy A25) and its inevitable impact on the roads around Send. Despite assurances of an additional railway station, commuters will utilise the opportunity to leave the A3 at the existing Burnt Common roundabout and travel on the faster Woking to Waterloo line, rather than use the slower Guildford line.

- I OBJECT to the proposed developments opposite Winds Ridge (policy A44) and Clockbarn Nursery (policy A42) due to the impact that the additional traffic will have on small local roads. The first of these will increase the traffic leaving Send Hill onto Potters Lane at what is already a dangerous junction on very narrow lanes. Meanwhile, Send Road is already frequently blocked by HGVs trying to turn into Tannery Lane; this can only be made worse by additional traffic using the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO THE IMPACT ON THE GREENBELT STATUS OF THE VILLAGES

- I OBJECT to GBC’s plan to remove Send and Ripley from the Greenbelt. The precious Greenbelt is not just a ‘nice to have’, but is an inalienable public good including space for rural leisure and tourism activities, flood control and benefits to public health. Once the greenbelt is built on, it will never be reinstated. The Local Plan seems to be prepared to ‘ride rough shod’ over the Greenbelt, even to the extent of losing ancient woodland at Garlick’s Arch.
- I OBJECT to GBC’s plans to allow ‘insetting’ the villages from the Greenbelt and infilling within village boundaries. This will erode the pockets of Greenfield sites around Send and Ripley and will result in an urban sprawl, effectively linking Woking and Guildford. I understand, and support, the appropriate use of brown field sites to build additional housing as required for the local population. However, the Local Plan appears to be taking the easy and cheaper option, of eroding Greenbelt, rather than actively searching for opportunities within urban Guildford where the infrastructure is already in place to support the resultant increase in population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/959  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion of Garlick’s Arch leads to cynicism and doubt that due process is being followed.
- I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1838  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **I OBJECT** to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

- **I OBJECT** to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SLP16/856  **Respondent:** 10800673 / Nigel Rowland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT TO THE FACT THAT GBC HAVE NOT FOLLOWED THE CORRECT PROCESS**

- **I OBJECT** to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

- **I OBJECT** to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a planning inspector.
I urge you to reconsider and to listen to the voices of those of us who have lived here for many years and understand the full implications of what is being suggested. The residents of Send do not deserve to be treated in such a cavalier and irresponsible way by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1642  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

Now 60 homes in place of 45 homes previously

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1643  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Garlick’s Arch, Send Marsh, Policy A43.

Now 400 homes and 6 Travelling Showpeople plots

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no “exceptional circumstances” exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Green Belt, Policy 2 at paragraph 4.3.15

*Send Business Park now taken out of the Green Belt altogether*

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

Please stop and consider again, the Plans you a proposing, if followed through, can never be undone and the damage to our environment will be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Presumption in favour of sustainable development jars with other requirements, such as protecting Green Belt. There is no process laid out as to how such conflict would be managed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/568  Respondent: 10802177 / roger harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The plan fails honestly to define Guildford, which is a part of London's hinterland, refuses to explain the basis on which "housing need" has been assessed, and is attached to dishonest claims to protect the Green Belt. Complexity of argumentation disguises the reality that the Plan clears the way for massive development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/573  Respondent: 10802177 / roger harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence base has been hidden from the citizenry on the crucial issue of housing need assessment. For Garlick Arch no evidence worth the name has been provided. The recent commitment by the UK Government to exit the EU and to impose substantial controls on migration must fundamentally change any assessment of housing need in the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/571  Respondent: 10802177 / roger harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Requirements to properly consult have been overridden; no consultation whatsoever has been possible, for example, in the last minute inclusion of the Burnt Common "Garlick's Arch" estate. The duty to consider use of Green Belt land only in exceptional circumstances has not been met. No assessment has been made of the impact on water, sewerage, power, transport by road and rail, schooling, medical facilities, footpaths and road safety, all of which would be severely affected adversely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

A sound plan would start by correctly identifying the geographic and social context of Guildford and its villages. The methodology of this Plan could be used to concrete over the entire Green Belt, and, the South East of England could become a megapolis.

A sound plan would take account of the massive response to the previous flawed Plan in 2014.

A sound plan would look at the constraints imposed by the nature of a gap town, as well as of the infrastructure which is itself constrained by those physical hills and rivers.

A sound Plan would set out practical and legal reinforcement of barriers to unwanted development on Green Belt land, SSSI and AONB.

A sound Plan would press the University of Surrey to accommodate its students within existing planning permissions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/16490</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reason for objecting are that the local roads, including the A3 and M25 are already too congested and the proposed development will add further to the current level of congestion and pollution. The smaller roads through West Clandon, Ripley and Send cannot cope with the increased level of traffic that such developments will bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/1270</th>
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<tr>
<td>I object to the proposed Guildford Borough Submission Local Plan 2016.</td>
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<td>I object to Policy A42 - the building of houses in Tannery Lane.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A43 - the building of houses on land at Garlick's Arch, Send Marsh/Burnt Common and Ripley.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>I object to Policy A 43. 30 ha Land at Garlick's Arch being designated for new housing. The need has not been established.</td>
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<td>I object to the proposed loss of the ancient woodland.</td>
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<tr>
<td>I object to Policy A43a - the building of new North facing slip roads to/from A3 Send Marsh/Burnt Common.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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</table>
I object to Policy A44 - the building of houses on land west of Winds Ridge and Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1275  Respondent: 10803009 / M Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44 1.9 ha land west of Winds Ridge and Send Hill was not included in regulation 18 draft and has not been consulted on appropriately.

I object to the GBC local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2535  Respondent: 10803009 / M Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the evidence provided in terms of Employment Land Needs Assessment 2015 (ELNA). The number of foreign students has been wrongly used to inflate the need.

I object to evidence of infrastructure assessment. Infrastructure overload is a major concern. Unnecessary road deaths have occurred at London Road South B2215 due to inadequate road management, maintenance, etc... GBC is culpable and to increase traffic load with such poor management standards risks further unnecessary road deaths. Congestion during rush hour, inclement weather, road obstacles, etc. drives the entire area into gridlock.

I object to proposed inadequate assessment of infrastructure solutions. Our property on London Road already suffers from the volume and scale of traffic causing damage to the structure of the property. The noise and pollution already adversely affects my small children. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to Policy P2. Send should not be removed from the Green Belt.</td>
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<td>I object because GBC has not followed due process under regulation 18 requiring full consultation to the further proposed changes to numbers of houses to be built. Regulation 19 is not sufficient in this instance.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The change represents an increase of 33% in homes and this is excessive for the area
- It ignores the hundreds of objections made by locals previously
- Further increase in housing development will negatively impact the traffic problems in the area. Traffic on the A247 junction is already an issue.
- Further increase in housing development will negatively impact the Green belt
- Further increase in housing development will negatively change the character of our village to worse
- Further increase in housing development will impact the views from the River Wey Navigation
- Further increase in housing development will impact the local school. More places will be required in a school that has little capacity.
- Further increase in housing development will impact negatively on local population health. The Villages Medical Centre is already maximised and can’t deal with more demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 proposed change at Garlick’s Arch because:

- The amended plan ignores the thousands of previous objections from the local population.
- There is no proven demand for Travelling Showpeople plots in this location in the amended plan
- This area is a beautiful Green Belt area with many old mature trees. No exceptional circumstances exist.
- An area where wildlife and plants can grow preserving our heritage.
- It is land between the A3 and the village and protects the local residents from increasing noise and pollution from the A3.
- Green Belt is part of our village setting, it is what makes our village a village. Send residents live in a village as this is the setting Send offers: living close to protected Green Belt and not in a town.
- 400 homes and 6 Travelling showpeople plots will impact the village character of Send. Woking and Guildford are nearby to offer town amenities if required. The proposed 400 homes and 6 Travelling Showpeople plots are an excessive increase to Send / Ripley and this will result in overpopulation with more traffic impacting local roads and village.
- The area around London Road / Roundabout at Shell Garage / Portsmouth Road / A247, already has high levels of traffic in all directions, not just at peak times in the morning / evening but throughout the day / night.
• This area is particularly congested between 7:15 - 9:00 AM and 16:30 - 18:30 mainly by passing through traffic, impacting the local area. These roads serve as an alternative to the A3 leading to this congestion. Often the traffic is standing still during these hours.
• The proposed 400 homes and 6 Travelling Showpeople plots will impact traffic on these roads. These roads / junctions are unable to cope with more traffic. This will require more funding to rectify and impact locals with ongoing road works.
• The proposed 400 homes and 6 Travelling Showpeople plots will impact the local schools - the local Send school has just been extended and does not have sufficient capacity for more. This will require more local funding.
• The proposed 400 homes and 6 Travelling Showpeople plots will impact healthcare. The Villages Medical Centre does not have sufficient capacity at present, let alone for a substantial increase in residents. This will require more local funding.
• The proposed 400 homes and 6 Travelling Showpeople plots will impact local air quality, water resources, ground pollution. Wildlife and flora are impacted. As the land is so near the A3 health for residents could be affected by asthma etc.
• The proposed 400 homes and 6 Travelling Showpeople plots will impact the flooding situation in the area. The area is already suffering from flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1688  Respondent: 10803009 / M Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 change at Burnt Common because:

• It was deleted from the 2014 draft due to multiple previous objections
• The work minimum is a change from the previous maximum in the 2016 plan. Since then there has been a decline in the demand for industrial land.
• Slyfield/Guildford has vacant sites to accommodate industrial / warehouse demand.
• The 2017 Employment Land Need Assessment shows a reduction in demand so no need to develop Burnt Common site.
• The proposed industrial / warehouse development will impact the Green Belt of the villages Send / Ripley. It will change the character of the villages and not preserve the heritage and Green Belt of this area.
• The proposed industrial / warehouse development will impact local traffic. The roads around the Shell garage roundabout are already severely congested and this development will impact this even further. The U-turn on London Road near the proposed site is already dangerous, accidents have occurred as the traffic coming from the A3 onto the London Road is travelling at minimum 50 mph. The proposed industrial / warehouse development will increase traffic on this junction.
• The proposed industrial / warehouse development will impact noise in the area. Noise is already an issue being so close to the A3 and the London Road / A 247 itself are noisy with traffic. Lorries parked on the London Road are already contributing to this noise day & night.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp171/476  **Respondent:** 10803009 / M Robson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy 2 at paragraph 4.3.15.

I object to the proposal to inset Send Business Park from the Green Belt because

- It is non-confirming user in an area of outstanding countryside directly next to the beautiful Wey Navigation.
- There is vehicular restriction along Tannery Lane in both directions.
- Further development will impact the Green Belt and the openness of the area.
- Further development will impact the character / heritage of the village.
- Further development will lead to increased traffic in the area, an area that is already severely congested.
- Further development will impact flora and fauna in the Green Belt.
- Further development will increase noise levels in the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/1795  **Respondent:** 10803105 / Lorraine Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I would like my comments noted please on the below points.

I strongly object to the following proposals:

The development of over 2,000 houses planned for Wisley Airfield. This will impact on the infrastructure already existing in the Horsleys, Ockham and even as far a field as Cobham. Two thousand homes planned brings with it more families which cannot be accommodated in the surrounding villages to Wisley. Already we have to wait several days for doctor appointments at Horsley. Local children cannot get school places at the nearest secondary school in Effingham. And planning permission to increase and move the secondary school has been objected. Roads around Wisley are congested enough as it is without a further 2,000 cars on these narrow roads. Local roads around Wisley suffer terribly with drainage and flooding and no scope for improvements, this will be exasperated if more homes are to be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/3857  **Respondent:** 10803105 / Lorraine Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of The Horsley’s from the Green Belt and the extension of the boundaries of the settlement areas. The exceptional circumstances required before taking this action have not been demonstrated. The proposals seem to be aimed at increasing the land available within the settlements for future additional development. Horsley is a village by definition and we want to keep it as such and within the existing green belt. The additional houses planned increase the population of West Horsley by a staggering 35% which is far greater than any other single area in the Guildford Borough. How can this be right ?? And it is for this reason I object strongly to the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/107  **Respondent:** 10803137 / William Hall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to voice my objection and concern for the proposed development of circa 400 houses in Send.

In short the local infrastructure cannot cope with the current population growth let alone another 1000+ people. The doctors surgery is creaking and requires a one week plus waiting list. The local school is probably one of the worst in the county with several friends pulling their children out and having to suffer the financial burden of private schooling despite paying taxes for state education. Roads in the area incredibly congested and at times during rush hour the queue from the Old Woking roundabout is often past the end of Potters Lane. On that subject the traffic from the A3 through Potters Lane is horrendous with very few adhering to the speed limit. Lorries follow the satnav down a totally unsuitable road. I genuinely think it is only a matter of time before a child is killed on the road.

It’s worth mentioning specifically the junction on Potters Lane where Send Hill, Church Lane and Vicarage Lane meet. With the increased traffic volumes this has become incredibly dangerous. As one example my sister in law was pulled out...
on and wrote her car off with a 6 month old baby in the back (it was incredibly lucky there were no serious injuries). I have had to brake suddenly and take avoiding action on numerous occasions. These are country lanes that form a large part of the roads in the area, they simply will not cope with increased traffic volumes.

It’s worth pointing out at this stage therefore that the idea of 40 more homes in Send Hill is just ridiculous from a traffic and infrastructure stand point. Also why are two travellers sites required? I have seen no evidence to suggest that they are required and none provided by the council?

Also Send is a wildlife corridor with several endangered and rare species (bats, newts, Owls etc) relying on this piece of rare green belt. Clearly I also object to the ridiculous idea of another industrial estate, do we not have enough in the area already? We have a duty to our children to retain green areas and protect the intimacy of the village environment.

Flooding is another yearly issue that seems to go un discussed, I’m sure the residents of Old Woking will be very glad of 500 extra homes as they flood for the third year in a row.

Frankly the fact that these proposals have come up again after being turned down is depressing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I object to the proposed Infrastructure Schedule</td>
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<tr>
<td>This makes no mention of Garlick’s Arch and therefore infrastructure for this development has not been taken into account. The ill-thought out positioning of the A3 junction at Garlick’s arch instead of say Ockham where 2100 houses are suggested to be built by the Plan further indicates the integration of Garlick’s Arch into the plan is not properly considered and opportunisitic.</td>
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I object to the lack of evidence base for the level of overall housing identified in the Plan

I object to the use of poor data in predicting the actual numbers of houses needed in the Plan. This is based upon 693 houses per year needed primarily due to predicted increases in student numbers e.g. at the University. Let me tell you now as a professor at the University we will not be seeing anything like that growth especially considering the impact on EU recruitment via Brexit. The whole evidence base via the Strategic Housing Market Assessment seems ill informed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3472  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to traffic congestion that will results from the development of the Wisely Airfield / Three Farms Meadows into a 2100 dwelling housing estate

I object also to the proposed plans for development of the Wisely airfield at the Ockham A3 junction into a 2100 dwelling housing estate. There is simply not the local infrastructure in place – primarily transportation infrastructure – to support this development. I live right on Ripley High St and can tell you we have grid-lock every morning in both directions. I invite you to visit and see the long queues, in both directions. 2000 new homes many of which will commute South on the A3 to nearby villages will create massive amounts of new traffic, and it will all go through Ripley's 1 main road - the High Street to get to the A3 southboard sliproad at Send. As experienced local planners you must already be aware of 2 examples of local precedent to mitigate critical traffic levels in Ripley in the recent past:

1) The relevant local section of the A3 is called the "Ripley Bypass". It was built to divert the massive amount of traffic going down Ripley High St (the "Portsmouth Rd.") around Ripley. This is going to happen again if you build 2100 new houses next to Ripley without letting them use the Ripley bypass. Now you may say they can just go via A3 North, and around the M25/J10 roundabout, but in the morning that is even more seriously gridlocked and it is obvious that faced with a queue 40 mins there or just driving through Ripley then commuters will do the latter.

2) Prior to consideration of the Wisely airfield being used for housing, it was given permission (on Sec. of state appeal) to be a large waste composting plant. This was a huge concern to the late Cllr. John Garrett and he demanded several planning conditions put in place, one of which was a ban on the lorries using the plant driving through Ripley. He understood the problem of increasing the already serious levels of traffic through Ripley and the damage it could cause to the village's character not to mention the safety issues. As you probably know we have 2 schools and a lot of elderly residents in Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3474  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on grounds of preservation of the environment to the development at Garlick’s Arch (proposed housing, industrial estate, and A3 junction)

The historic and ancient woodland at Garlick’s arch will be destroyed for housing and industrial needs completely against the basic tenants of the Green Belt. The response of Guildford Council is to delete Send from the Green Belt. I would argue a better solution would be to build the housing somewhere outside of the Green Belt.

I object on grounds of flooding to the entire development at Garlick’s Arch (housing and junction)

The area of the A3 junction is also in a 1 in 100 chance of flooding zone making it inappropriate for development to which I raise a further objection,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3473   Respondent: 10803297 / John Collomosse   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on grounds of local traffic congestion to the development of the A3 junction at Garlick’s Arch

I object that you are proposing to build an A3 junction at Send / Burnt Common due to a further 400 housing plus industrial estate being planned for Garlicks Arch. But this will do nothing for all of the 2100 houses who will send their ~2000 cars south through the village of Ripley on their commute to Guildford. Indeed it will attract traffic through Ripley where congestion is already a massive problem in the mornings as people use Ripley as a cut-through from the M25 to Woking. You will not see just a slight increase in congestion, literally the route will be at a standstill unusable for this Wisley housing.

It seems to me that the choice to site the junction at Garlick’s Arch is opportunistic – not strategic. Free land to build the junction has been offered by the farmer land-owner in return for him being allowed to sell his land to build the 400 houses. Surely the better strategic option would have been to build the junction near the 2100 new houses at Ockham, not near the 400 houses at Send? It seems a no brainer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7665   Respondent: 10803297 / John Collomosse   Agent: 

Page 2064 of 3142
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25

The A3 or M25 would have to be improved before any development is done to handle the resulting traffic. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield, Garlick’s Arch and Gosden Hill are not strategically viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7666  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact on air quality that both the Wisely development and the Garlick’s Arch development will have

I object to the developments in Ripley and Send also on the grounds on air quality which is sure to be harmed by the massive influx of traffic from 2500 homes in the area which will likely bring about 5000 cars to the area. This will be particularly acute in Ripley – a village of only around 2000 people, you are tripling the size of without any supporting road infrastructure leaving stationary grid-lock e.g. on the Ripley High Street where I live, no doubt reducing the already poor air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7663  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Ripley, Send and Clandon from the Greenbelt, and general failure to protect the Green Belt in the Plan.

I strongly object to the removal of several of our rural, historic villages from the Green Belt, including Send, Clandon and my own village of Ripley – as well as the ancient woodlands and green belt meadows at Wisley Airfield and Garlick’s Arch. Once removed from the Green Belt they will be gone forever. The villages, particularly Ripley, are ancient with a rich history, character and significance as recognised, for example, by the Ripley conservation area and Ripley regularly appearing in the media as an archetypal English village. The Green Belt was one of the major planning triumphs of the last century, safeguarding uncontrolled development and urban sprawl. The government itself has reiterated that Green Belt should not be violated for housing needs, which is exactly the motivation for removing these villages from the Green Belt in the Plan – there is no “exceptional reason” for insetting these villages or sites other than housing targets. The net effect will be a sprawling extension of Guildford north along the A3, destroying woodlands, open spaces and the character of local villages with clear deleterious effects. The villages will be infilled with housing and merge into one destroying their identity forever. I understand that there are brownfield sites even within these villages that can be developed instead e.g. south of Burnt Common. Clearly we should be developing those and other brownfield sites in the borough instead of destroying virgin Green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7664  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the scale of development for Ripley and Send in the Plan

I object to the balance of new housing being shouldered primarily by Ripley and Send. There are virtually no employment/jobs in these villages but much of the borough’s housing target is being deployed in these two villages via Garlick’s Arch (400 houses) and the Wisley Airfield (2100 houses). Surely it makes sense to rebalance this allocation so that most of the housing is local to Guildford where people will want to work or catch a train to work from (there are no practically accessible stations near these proposed developments). There are other available options such as the University owned land that could have been used to develop a new quarter of Guildford fulfilling much of the housing target – why has this not been identified in the strategic plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1150  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I object to the poor communication of the revised Plan and limited time available to comment

The draft local plan including its accompanying volumes is 1800 pages long and we have had only 6 weeks to digest it and comment on it. Indeed I was unaware of the Plan until a couple of weeks ago due to limited notification of the Plan to residents by the Council. Indeed some evidence on which the Plan is based such as the SHMA plan is not even published so it is not possible to properly examine the Plan.

It is unreasonable to expect working people to read a 1800 page document in 42 days (that’s 42 pages of reading per night on an unsustainable nightly basis) let along digest its content. The website hosting the local plan is in my professional opinion as a computer science academic and chartered software engineer, one of the worst I have seen in terms of its accessibility and comprehensibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp172/5037  Respondent: 10803329 / Jane Pitson  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3224  Respondent: 10803809 / David Jones  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. I request that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of my village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6359  Respondent: 10803809 / David Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13281  Respondent: 10803809 / David Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13279  Respondent: 10803809 / David Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for various farms and tracts in the Horsleys and Garlicks Arch at Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13280  Respondent: 10803809 / David Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us.
If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/13278</th>
<th>Respondent: 10803809 / David Jones</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the 2016 Draft Local Plan as follows. I believe the Local Plan will have a direct and detrimental effect on the amenity currently enjoyed. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed with no real consultation being undertaken with the residents. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10803809 / David Jones</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. I have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I request that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPA16/264</th>
<th>Respondent: 10804961 / M. Basson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Village facilities

The infrastructure of the West Horsley, as well as East Horsley cannot support a potential effective doubling of the households and residents.

The villages are extremely rural in character. East Horsley has one public house, a church, a hotel, very few shops, and not one state school. The two boys only private schools already produce significant traffic problems at each end of the school day on Ockham Road North and the A246.

Secondary school places are limited at the Howard of Effingham School and other secondary schools are a greater travelling distance from the village.

West Horsley alone includes no less than 41 listed buildings, some dating back to the 15th century.

West Horsley has one shop, no post office and one highly over-subscribed school.

The single medical centre shared between East and West Horsley is similarly over-subscribed and residents have difficulty in getting appointments. Such a massive increase in population as proposed would stretch this service to beyond breaking point. The planned population increase for the Borough would also mean a major extension of the Royal Surrey Hospital to allow it to cope.

Parking facilities are extremely limited in the shopping areas of East and West Horsley, as well as Horsley station. The impact of such a large increase in population as proposed would overstretch these facilities. It would make it difficult if not impossible for many of the older and less mobile inhabitants to reach the shops, and most importantly the medical centre and chemist.

Roads
Traffic generation from the proposed development would be considerable, with most households having two cars, many with three.

The Street, which constitutes the only entry to West Horsley from the A246, is very narrow, and it would not be possible to widen it. This road is already often perilous, particularly when large lorries, buses and tractors pass through. To increase such traffic, which would result if the proposed developments were to proceed would be wholly irresponsible.

**Transport**

- West Horsley’s bus service through the village is extremely limited and only operates two/three times per day Monday to Friday.
- The bus service running from Guildford to Leatherhead travels along the A246 at the southern end of the village and is really only of use to residents living within a maximum of eight to ten minutes walk from the bus stops at the Bell and Colvill roundabout.
- Parking at Horsley station is limited and sometimes full on a weekday. There is no land to create additional parking for the increased need that the proposed expansion would bring.

**Drainage /flooding**

The road where I live, Green Lane, has an under-capacity of existing drainage, sewers and treatment works to cope with heavy rainfall. When heavy rain does occur, the water in the toilets in our house rises alarmingly and they cannot be used, the drains and sewers flood the road and our garden, requiring several visits from the water company to clean and sanitise the ground. This happened again this week (23rd June). The current infrastructure is unable to deal with the requirement.

The land between Silkmore Lane and Ripley Lane is frequently subjected to such serious flooding that Ripley lane becomes absolutely impassable several times per year. This land slopes significantly towards Ripley Lane, and during periods of sustained rainfall, flooding always occurs. Severe flooding also frequently occurs on The Street, East Lane, and Long Reach, to the extent that these roads, and in particular the hill under the railway line often become impassable.

**Impact on Areas of Outstanding Natural Beauty**

The impact of the proposed housing estates would be to blight the surrounding areas of outstanding natural beauty. Many of the proposed sites are so close to such areas that it would no longer be appropriate to refer to these as such, as they would become reducing areas of green countryside, surrounded by urban sprawl.

Most of the areas proposed for potential developments are contiguous with AONB and it is my understanding that statutory protection is afforded to areas contiguous with AONB.

**Impact on Wildlife**

The impact on wildlife in the Horsleys would be devastating. In my own garden, I have had grass snakes, hedgehogs, weasels, toads and deer and have observed red kites and woodpeckers. These species would be under threat form loss of habitat, and in some cases, predatory cats, the population of which would increase with the proposed rise in homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPP16/830  Respondent: 10804961 / M. Basson  Agent:
<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>PART SUPPORT, PART OBJECT We support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings.</td>
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<tr>
<td>There is no reference to vernacular or historic design guidelines, even in Conservation Areas and we object to the absence of this from this policy. Most of the borough, especially the rural areas, has vernacular design guidelines which are available to give suggestions as to appropriate design. These should have mandatory planning force.</td>
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<tr>
<td>The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design – should it not result in better designed buildings?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/831  Respondent: 10804961 / M. Basson  Agent: |

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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Generally OBJECT The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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| Comment ID: PSLPP16/832  Respondent: 10804961 / M. Basson  Agent: |

| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PART SUPPORT, PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum, etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The reasoned justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/833  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/822  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**OBJECT** because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**OBJECT**: I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/824</th>
<th>Respondent: 10804961 / M. Basson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/825  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/826  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk.

Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town.
Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/827  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/828  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PART SUPPORT, PART OBJECT We think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. We think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. We do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/829  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT We do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/815  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/816  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT. “Affordable” homes, under national definitions means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/817  Respondent: 10804961 / M. Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/834  Respondent: 10804961 / M. Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These
detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/835  Respondent: 10804961 / M. Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/836  Respondent: 10804961 / M. Basson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT We support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered,

It is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.
How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process – the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a three hour commute add one hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY I4 Green and Blue infrastructure**

**OBJECT** The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Page 2081 of 3142
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing concerning the local plan, as I object to the large majority of the proposals contained within it. It is unacceptable to build 70% of the new housing on either Green Belt or on countryside beyond the Green Belt, and not to build more on urban brownfield sites. It is also unacceptable to remove 14 villages from the Green Belt, and to propose that infilling is acceptable within a further 12 villages within the Green Belt. This means that huge swathes of the Green Belt are now vulnerable to extensive further development. All completely unacceptable and contrary to national and local policy.

The plan shows 533 new houses in East Horsley and West Horsley. Should this go ahead, it will change irrevocably the character of the area, for the worse, which is unjustified and unnecessary.

I object strongly to Policy P2 and the other policies as referenced below.

I have outlined below why this is the case based on my local knowledge of the area where I live. I have also included my general objections to various policies within the plan.

Policy P2: Green Belt Status

There is no justification or believable rationale that the land in question can be removed from the green belt. This view is the opinion of the local residents shown in a petition and demonstrates the strength of local opinion against the proposed development. The residents are overwhelmingly disappointed with those they have elected to represent them, and are horrified that they have agreed to adopt such policy.

National policy on the Green Belt, as set out in the National Policy Planning Framework, makes clear that most development in the Green Belt is inappropriate and should only be approved in very special circumstances. Planning guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt.
Amongst other relevant factors, the National Framework states:

- The core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside.
- Once established, Green Belt boundaries should only be altered in exceptional circumstances.
- The purposes of the Green Belt include checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another; and assisting in safeguarding the countryside from encroachment.

Therefore, the Council’s plan is at completely at odds with the Government’s national policy, and alternative, more suitable and logical action should be taken – e.g. the National Framework does allow for redevelopment of previously developed sites (brownfield land) – although again, under certain guidelines.

- The large number of houses (385 homes on Green Belt land in West Horsley alone) identified for potential development in West Horsley would be totally out of character with the existing make-up and layout of the village.
- The village settlement is comprised of low density housing with a considerable mix of ages and housing styles, including a good number of historic buildings.
- The need for so many houses in Guildford borough, never mind West Horsley, has not been proved in the Consultation documents.

Through a 2014 housing survey, West Horsley Parish Council has confirmed a limited need for 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/819  **Respondent:** 10804961 / M. Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt which is anomalous. I think that the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.

However, urban development on hardstanding does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/821  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/813  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/814  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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**Comment ID:** PSLPP16/838  **Respondent:** 10804961 / M. Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Council needs to completely rethink its priorities and very carefully consider the views and requirements of the borough’s residents. We need a less contentious and more viable plan, which proposes a sustainable and suitable level of development. The use of brownfield sites should be high on the agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/188  **Respondent:** 10804993 / Alex Laing  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of immediate provision for new schools
- I object to the lack of any immediate provision for Doctors' surgeries, and other local amenities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/187  **Respondent:** 10804993 / Alex Laing  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<tr>
<td>• I object to the lack of any evidence for the alleged housing need numbers</td>
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<td>• I object to the lack of a balanced and sustainable strategy combining development and conservation and providing affordable housing for local people</td>
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| Comment ID: PSLPP16/601 | Respondent: 10804993 / Alex Laing | Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I would like to object to the Guildford 2016 Draft Local Plan in the following areas:

- I object to any and all reduction of the green belt
- I object to any removal of villages from the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: PSLPP16/605  **Respondent:** 10804993 / Alex Laing  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

- I object to the fact that this plan, if implemented, would result in the merging of all villages along the A3 from the M25 to The Hog's Back, to become a metropolis

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: PSLPP16/603  **Respondent:** 10804993 / Alex Laing  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
• I object to the disproportionate amount of development in one area of the borough (i.e. to the north east, where I live)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

• I object to the limited consultation period
• I object to the last minute inclusion, into the plan, of new housing development sites with less than two weeks notice
• I object to the inclusion of 2000 homes on the Wisley airfield site when the previous proposal to develop this has already been rejected by GBC as unsuitable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/322</th>
<th>Respondent: 10805089 / Michael Stuart</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

The lack of proposed new infrastructure and facilities just to cope with the needs of those already living in these areas, without increasing the demand by intensifying the housing;

I object to the lack of immediate provision for new schools, GP surgeries etc. locally;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/942</th>
<th>Respondent: 10805089 / Michael Stuart</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>

2089
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have (believe it or not!) studied the Draft Local Plan which I fear has been designed to be totally inaccessible and incomprehensible on purpose for many local people to even wish to read. It is incredibly lengthy and overlooks the fundamental principle that there exist many brown field sites within the borough which are not being developed upon.

The insetting of local villages such as East and West Horsley, Ripley, Send, Clandon, to name but a few is just, it seems to me, a tactic to their removal from the Green Belt allowing increased and inappropriate development thereon.

Green Belt by its very name is defined as "an area of open land around a city" -there will be no open land around Guildford if the local plan is ratified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/941  Respondent: 10805089 / Michael Stuart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the 2016 Local Draft Plan

I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.

I live in West Horsley and worked hard to be able to afford to purchase a house in this gorgeous part of the world. I enjoy my rural lifestyle. walking at Sheepheas with my family and dog and being surrounded by green. open space. Had I wished to live in an urban location I would have bought a property within Guildford itself, Inner London or any other built up part of the world.

I wish to protect the Green Belt from erosion by possible future disproportionate development. particularly at this development for housing is based on a housing need which has little or no evidence to support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/943  Respondent: 10805089 / Michael Stuart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note that I object, very strongly, to the following:

Lack of evidence of the housing need in the borough;

Insetting of villages thus allowing increased development into the future;

The proposed erosion of the Green Belt in any way, shape or form;

The length, complexity and most specifically the absurdly short time frame for consultation of the Draft Local Plan;

The council ignoring the existence of the numerous suitable brownfield sites within the borough which could be used for future development;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/944  Respondent: 10805089 / Michael Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the potential six main development sites contained in the Draft Local Plan which are located in and around the Horsleys;

Please ensure that my comments are available for the Independent Inspector's consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/745  Respondent: 10805121 / Alison Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )
The proposals for the A3 will not answer the infrastructure problems or needs of Guildford. We need a tunnel to go under Guildford, removing the impact of through traffic and leaving the existing A3 to provide an additional route across Guildford for local traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2486   Respondent: 10805121 / Alison Vincent   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

I appreciate the need for housing. However, developers will choose the easiest sites to develop (to maximise their profits) and these are the greenfield rather that the brownfield sites. As housing needs may drop due to Brexit, there is a risk that the greenfield sites will be lost and the unsightly brownfield sites remain undeveloped (eg the Portsmouth Rd site). I would like to see a system to ensure that NO greenfield sites are released until the brownfield sites are used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1368   Respondent: 10805217 / John Carr   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham  
This letter is further to my letter of 19 June concerning the Proposed Submission Local Plan and provides additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’.

I strongly OBJECT to this proposed policy for the reasons detailed in this letter.
1. The proposed development represents a fundamental breach of Metropolitan Green Belt rules;
2. This site does not meet acceptable levels of sustainability:
3. The site will have a severe impact on local traffic & infrastructure: and
4. The development is totally out of keeping with local character, context & distinctiveness.

Taking these points in turn:

**The proposed development represents a fundamental breach of Metropolitan Green Belt rules**

The site forms part of the Metropolitan Green Belt. Under NPPF regulations, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

*Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.*

**This site does not meet acceptable levels of sustainability**

The site has poor sustainability:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development;

- There will be significant environmental damage from this development;

- There is no public transport currently serving this location;
The nearest train stations are Horsley and Effingham Junction, both around 3 miles away - too far to walk. Neither of these stations currently have significant parking capacity available.

Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

The site will have a severe impact on local traffic & infrastructure

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Many of these roads that will carry this traffic are without pavements for large stretches, whilst the principle through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which suffer from traffic congestion at peak hours.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will daily cycle 3 or 4 miles along busy roads in order to access one of these two stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

The development is totally out of keeping with local character, context & distinctiveness

In the 2016 Proposed Submission Local Plan, GBC’s first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The current and historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area.
East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1760 homes. East Horsley presently has an overall density of 8.1 dph within its settlement area. Therefore, the proposed development of Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own housing plan policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches emerging GBC Policy H1.

APPENDIX

The following table sets out an analysis of new housing developments proposed in the draft Local Plan and provides an estimate of the new of developments which are set within the Metropolitan Green Belt:

<table>
<thead>
<tr>
<th>Planned Delivery between 2018 and 2033 (See Policy S2, page 27)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Settlement</td>
</tr>
<tr>
<td>Guildford Town Centre</td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
</tr>
<tr>
<td>Ash and Tongham</td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
</tr>
<tr>
<td>Rural exception housing</td>
</tr>
</tbody>
</table>

APPENDIX
<table>
<thead>
<tr>
<th>Project Description</th>
<th>Units</th>
<th>Y/N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>(Policies A25 and A26)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion (Policy A46)</td>
<td>1,100</td>
<td>Y</td>
</tr>
<tr>
<td>Village extensions (including Ash Green southern site)</td>
<td>993</td>
<td></td>
</tr>
<tr>
<td>Ash Green southern site (Site A27)</td>
<td>58</td>
<td></td>
</tr>
<tr>
<td>Village extensions (excluding Ash Green southern site)</td>
<td>935</td>
<td>Y</td>
</tr>
<tr>
<td>Windfall</td>
<td>625</td>
<td></td>
</tr>
</tbody>
</table>

**Totals:** 13,652 8,895

**Proportions:** 100% 65%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/510  Respondent: 10805217 / John Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Comments on Proposed Submission Local Plan
I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation. My comments are set out in this letter.
I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. I have three major concerns:

1. The scale of the housebuilding programme. The target outlined by GBC represents a 25% increase in the housing stock of the borough. The Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

2. The destruction of the Green Belt - I note that the Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt". GBC is in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be built on land that is currently Green Belt; and

3. Infrastructure - the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.
I therefore OBJECT to the Proposed Submission Local Plan.
These comments are developed in more detail below.

1. STRATEGIC POLICIES
Policy S2: Borough Wide Strategy
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.
I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough. The justification of this number, when the Office of National Statistics ("ONS") is projecting a population increase of some 15% for Guildford Borough over this same period is not given.
Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, ("SHMA"), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government ("DCLG") are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.
I cannot understand this analysis. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion

I therefore OBJECT to the borough housing targets set out in Policy S2.

3. PROTECTINGpolicies
This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.
POLICY P2: Green Belt
Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt.
Unfortunately, GBC is in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is an outrageous outcome.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty ("AONB") which is offered protection under the NPPF comparable to that of a national park.
Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is incomprehensible. I therefore OBJECT to the proposals to build on the Green Belt.

6. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies. The detailed infrastructure proposals for Guildford Borough which give me cause for concern. There are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

In East Horsley today:
? Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
? The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit;
? Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
? The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
? There are insufficient school spaces for the number of local children needing them;
? The Medical Centre in East Horsley is already at capacity in terms of its number of patients...

In respect of East Horsley, there are only two specific proposals in Appendix C:
LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and
HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.
There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this. Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier. The failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.
I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/111</th>
<th>Respondent: 10805217 / John Carr</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. HOUSING NEED

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes, a reduction from 13,860 homes proposed in the previous draft local plan. This is a fall of some 10.3% in the total number, although the annualised figure of 654 dwellings per annum represents a reduction of only 5.6% because of the different time periods considered by the revised plan.

This revised target for borough housing is still excessively high - the conclusions of the revised SHMA are seriously flawed.

The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 (‘SHMA Addendum’) issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in population trends, migration patterns and the economic development of the UK.

GL Hearn attempts to address this prospective uncertainty by presenting four alternative scenarios for their models, based upon different assumptions over the basic population projections utilised. Their four scenarios result in projected overall growth of Guildford borough housing needs over the plan period (based upon demographic trends) which is estimated at between 10.4% and 15.3% dependent upon the scenario assumed.

The lowest of these figures, 10.4%, is derived using projections based upon a 10 year migration trend and making an UPC (‘Unattributable Population Change’) adjustment as proposed by the ONS in order to take account of various statistical anomalies in sampling sizes, etc. This forecast population growth of 10.4% leads under their analysis to an annualised housing need for Guildford borough estimated to be 521 dwellings per annum. For reasons that are not explained GL Hearn recommends that GBC adopt the higher end figure of their scenarios, resulting in a proposed demographically-based housing need of 559 dwellings per annum, which is the figure adopted in the Local Plan.

As in their 2016 SHMA report, GL Hearn then proceeds to increase this figure further through a series of adjustments to reflect high levels of projected economic growth, additional student housing demand and the needs for more affordable housing. This approach is nonsense. Economic growth factors are effectively already included within the household growth projections put forward by the Department of Communities & Local Government. GL Hearn have increased their proposed overall housing need figure to 654 dwellings per annum, an increase of 95 dwelling over their own (upper end) demographic trend figure. GL Hearn’s justification for this increase is primarily to address affordable housing needs within Guildford borough and to a lesser extent to make extra provision for student housing. This adjustment makes no sense.

Under GBC’s Affordable Housing policy 40% of all dwellings at new developments must be built as affordable homes – therefore with a target housing figure of 12,426 new homes, that means that almost 5,000 new affordable homes would be built in the borough under this policy. Why a further adjustment is needed on top of this figure is hard to understand. Moreover, it begs the question: if more affordable housing is built above the 40% policy target, just who precisely is going to pay to subsidise this construction?

The net result of GL Hearn’s analysis is a projected housing need of 654 homes per annum, which if built would represent an overall increase of 22% in the housing stock of the borough. This compares to the ONS projection for population growth over the plan period (based upon a 10 year migration trend and making the ONS-proposed UPC adjustments) of just 10.4%. GBC are therefore proposing a housing figure which is more than twice this level of projected population growth. This is clearly unjustifiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC fails to make any allowance for planning constraints, particularly the Green Belt

The housing need projections of GL Hearn are taken by GBC directly as the housing targets proposed in the Local Plan. They therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt. They also fail to allow for the already over-stretched infrastructure.

Other local plans across the country have adjusted their housing targets to reflect such constraints. However, GBC chooses to ignore them. This is despite having a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”.

In order to meet its high housing targets, GBC proposes to remove large swathes of land from the Green Belt for use as housing. This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land.

The majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt.

Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue – there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan these voices have again been ignored by GBC.

I am strongly opposed to GBC’s position on this issue and accordingly:

I strongly OBJECT to the borough housing targets set out in Policy S2.

1. POLICY P2 Green Belt Policy

The revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village. Its housing density is low - the average density of housing is just 8 dwellings per hectare. East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

Accordingly:

I strongly OBJECT to the insetting of East Horsley proposed as part of Policy P2.

1. SETTLEMENT BOUNDARY

I also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix H maps for East Horsley (South). The Amendment 4 on this map addresses land
in the southern part of the village designated as being within ‘the identified boundary of the village’ and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.

This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken chalk lane, a single track road that dates back for many hundreds of years.

There is no justification to bring such land within the settlement area of the village. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

I strongly OBJECT to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/913  Respondent: 10805409 / David Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission local Plan 2016 ("local Plan")

Below are my objections to the Local Plan proposals for West Horsley:

1. Removal of West Horsley Village from the Green Belt

I object to the removal of West Horsley Village from the Green Belt on the following grounds:

- The Local Plan is taking West Horsley out of the Green Belt yet the Local Plan Policy 2 contains the statement "we will continue to protect the Metropolitan Green Belt" - this statement is contradicting the proposal
- West Horsley is a distinctive rural village in a rural setting with many historic buildings and The village's green belt status is essential to ensuring the character of the village remains
- Government guidelines require exceptional circumstance for removing the village from the green belt which cannot be justified on the basis of unfulfilled housing- what is the exceptional circumstance for this proposal?
- There is no explanation as to why West Horsley has been chosen to be removed from the green belt and no justification for doing so.
2. Objection to the Number of Houses being built in West Horsley

I object to the 4 Proposed Sites - Policy A41/Policy A40/Policy A38 and Policy A37

- The Local Plan has suggested a 35% increase in housing for West Horsley by 2022 and yet only a 11% increase in Guildford town. What is the justification for this?
- The Guildford Borough Economic Strategy document makes no case for locating large numbers of new homes in West Horsley- this is a village with no shops, no post office, no petrol station, no train station, no medical centre and a very limited bus. It also offers no employment opportunities for residents.
- The National Planning Policy Framework requires that new residential development must be limited in quantity by the availability of infrastructure and local facilities- this policy has been ignored in the Local Plan.
- The density of houses on the proposed sites is completely out of keeping with the rest of the village and will change the character of the village forever.
- The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area- this policy has been ignored in the Local Plan.
- About 10 houses on East Lane (mine included) currently back onto and look out onto open fields green belt land. Policies A38 and A41 allow 135 homes to be built directly behind these houses and 90 directly across the road from these houses- this will completely change the character of the village.

- The proposal for the 4 sites do not respect "the character and density of housing in this area".

1. Policy A41

Specifically object to the Proposed Site - Policy A41

- The Local Plan has included a new site - Policy A41 with a proposal to build 90 homes.
- This site is open fields green belt land and the land is one of the most important rural aspects of the village.
- The Policy will irrevocably destroy the character of West Horsley village as one of its most important rural features is that on the entry roads to the village (mainly Long Reach in this instance) there is a vista across fields as there is only development on one side of the road.
- The fields included in Policy A41 do not satisfy the criteria for development- they do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill.
- Development on a current site of open fields in green belt land surrounded by undeveloped countryside is in breach of the government's guidelines on building in the green belt.
- Residents on East Lane have previously had their planning applications refused on the basis that it interferes with the green belt contained in Policy A41- why has this now changed?

I urge you to consider these objections seriously and reconsider your plans for West Horsley under the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Objection to the Number of Houses being built in West Horsley

I object to the 4 Proposed Sites - Policy A41/Policy A40/Policy A38 and Policy A37

- The Local Plan has suggested a 35% increase in housing for West Horsley by 2022 and yet only a 11% increase in Guildford town. What is the justification for this?
- The Guildford Borough Economic Strategy document makes no case for locating large numbers of new homes in West Horsley - this is a village with no shops, no post office, no petrolstation, no train station, no medical centre and a very limited bus service. It also offers no employment opportunities for residents
- The National Planning Policy Framework requires that new residential development must be limited in quantity by the availability of infrastructure and local facilities - this policy has been ignored in the Local Plan
- The density of houses on the proposed sites is completely out of keeping with the rest of the village and will change the character of the village forever
- The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area - this policy has been ignored in the Local Plan.
- About 10 houses on East Lane (mine included) currently back onto and look out onto open fields green belt land. Policies A38 and A41 allow 135 homes to be built directly behind these houses and 90 directly across the road from these houses - this will completely change the character of the village
- The proposal for the 4 sites do not respect "the character and density of housing in this area".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2180  Respondent: 10805409 / David Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Policy A41

I specifically object to the Proposed Site - Policy A41

- The Local Plan has included a new site - Policy A41 with a proposal to build 90 homes
- This site is open fields green belt land and the land is one of the most important rural aspects of the village
- The Policy will irrevocably destroy the character of West Horsley village as one of its most important rural features is that on the entry roads to the village (mainly Long Reach in this instance) there is a vista across fields as there is only development on one side of the road
- The fields included in Policy A41 do not satisfy the criteria for development - they do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill
• Development on a current site of open fields in green belt land surrounded by undeveloped countryside is in breach of the government's guidelines on building in the green belt
• Residents on East Lane have previously had their planning applications refused on the basis that it interferes with the green belt contained in Policy A41 - why has this now changed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/4663  Respondent:  10805409 / David Walker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Removal of West Horsley Village from the Green Belt

I object to the removal of West Horsley Village from the Green Belt on the following grounds:

• The Local Plan is taking West Horsley out of the Green Belt yet the Local Plan Policy 2 contains the statement "we will continue to protect the Metropolitan Green Belt" - this statement is contradicting the proposal
• West Horsley is a distinctive rural village in a rural setting with many historic buildings and landmarks. The village's green belt status is essential to ensuring the character of the village remains
• Government guidelines require exceptional circumstance for removing the village from the green belt which cannot be justified on the basis of unfulfilled housing - what is the exceptional circumstance for this proposal?
• There is no explanation as to why West Horsley has been chosen to be removed from the green belt and no justification for doing so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2806  Respondent:  10805537 / Robert Mote  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. Why is there no schedule for Garlick’s Arch (A43)? The Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5797  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is and should be protected from development as Green Belt. There are no exceptional circumstances which justify its removal from the Green Belt (Policy P2). Central Government states quite clearly that housing need is not an exceptional circumstance.

The Plan states its preference to use previously developed land, but GBC has removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch.

How can GBC justify not including this large brownfield site? This area is not suitable for large scale development due to poor transport provisions,

a lack of school places, medical facilities and utilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5799  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43) when there is an existing industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. This site was removed from the Plan without any reasoning. This again shows a lack of foresight and total disregard for the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6065</th>
<th>Respondent: 10805537 / Robert Mote</th>
<th>Agent:</th>
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Garlick’s Arch has previously been protected from development as Green Belt, and there does not appear to be any justified exceptional circumstances which allow for the removal of this land from the Green Belt

Last minute The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency (see objection 4.). There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5796</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

Why to we need an additional north entry ramp for the A3 at Burnt Common when there is a perfectly adequate entry ramp in Ripley?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6064</th>
<th>Respondent: 10805537 / Robert Mote</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why do we need an additional north entry ramp for the A3 at Burnt Common when there is a perfectly adequate entry ramp in Ripley? This will only exacerbate the traffic issues that will be created by the massive house increase within the Send and Ripley areas. Furthermore there has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposed development would double the built up area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. This is totally unacceptable and again shows the Council’s complete disregard for local opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12468  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11761  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the extra congestion that these developments will cause to our local village roads and the lack of road infrastructure (Policy I1)

Our roads are struggling already in our local villages and this plan will exacerbate the amount of traffic in Ripley, Send and Clandon, with no proposed plans to improve the current roads.

The rural roads in this area are narrow, in poor condition, unlit and have no pavements. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11767  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

The Plan does not identify or provide for adequate infrastructure improvements to support the massive scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/12424  **Respondent:** 10805537 / Robert Mote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Our roads are struggling already in our local villages and this plan will exacerbate the amount of traffic in Ripley, Send and Clandon, with no proposed plan to improve.

The rural roads in this area are narrow, in poor condition, unlit and have no pavements. 5000 more houses means dangerous and unsustainable traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/12429  **Respondent:** 10805537 / Robert Mote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The Plan does not identify or provide for adequate infrastructure improvements to support the massive scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12451  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12470  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11768  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

This part of Surrey is already at capacity. The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even consider improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan, so the proposed developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) should not even be considered until a viability plan has been entered into.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12430  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This part of Surrey is already at capacity. The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even consider improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan, so the proposed developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) should not even be considered until a viability plan has been entered into.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12474  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11766  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The large developments being proposed, particularly in the north east of the borough will lead to increased congestion and to higher levels of air pollution. This will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12428  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The large developments being proposed, particularly in the north east of the borough will lead to increased congestion and to higher levels of air pollution. This will have a detrimental effect on local residents and their health, thereby further increasing pressure on what will limited local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12463  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11760  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This is a very shortsighted proposal and will do nothing to enhance the areas. I cannot see any exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12421  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This action does not meet National Planning Policy which requires for an exceptional circumstance to justify Green Belt boundaries to be altered or for development on Green Belt. There are no exceptional circumstances.

Furthermore as council tax payers we rely on Guildford BC to protect our environment and standard of living, not just to surrender large areas of Green Belt land without due thought as to its being done and for appropriate consideration as to whose interests are being served.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12446  Respondent: 10805537 / Robert Mote  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11763  Respondent: 10805537 / Robert Mote  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk category than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not conclusive enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12425  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan. I believe that a number of assessments have graded the flood risk as low, which I really find, literally, unbelievable.

Although I’ve lived in this area “only” since 1997, I’ve witnessed many years of flooding with varying degrees of impact.

Clearly the 2013/14 floods were particularly bad, with both Portsmouth Road & Send Marsh Road severely impacted, along with much of the surrounding land much of which is encapsulated within your plans, especially the proposed Garlick’s Arch development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12454  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11759  Respondent: 10805537 / Robert Mote  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to GBC’s proposed submission of Local Plan June 2016. My reasons are as follows:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable or viable as it will damage local communities by over development, particularly Ripley, Send and Clandon. The local communities do not need extra housing. There are no railway stations at Garlick’s Arch or Wisley Airfield and inadequate bus services, therefore most adults will have to have a car. The Plan does not contain any provisions to improve the infrastructure for Garlick's Arch. It would make more sense for the developments to be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12419  Respondent: 10805537 / Robert Mote  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13,860 new houses proposed is not sustainable or viable as it will damage local communities by over development, particularly Ripley, Send and Clandon. The local communities do not need extra housing. There are no railway stations at Garlick’s Arch or Wisley Airfield and inadequate bus services, therefore most adults will have to have a car. The Plan does not contain any provisions to improve the infrastructure for Garlick’s Arch.

The lack of “near by” employment opportunities and inadequate public transport would mean that even if developers were to build this type of housing (extremely unlikely), they would be unsuitable for the people they were built for.

It would make more sense for the developments to be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal to build 13,860 new houses without proper constraints in order to reduce the overall housing deficit differs from all the other Borough Councils in Surrey.

The Plan is biased and not fairly spread across the borough. There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Why is 36% of all the Plan’s new housing being proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12426  **Respondent:** 10805537 / Robert Mote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is biased and not fairly spread across the borough. There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Why has this area been proposed to meet 36% of the Plan’s new housing, whilst it currently has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12456  **Respondent:** 10805537 / Robert Mote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% greater than previous Plan, which itself was too
- It will seriously worsen access and traffic problems in Tannery Lane and at the A247 junction, which is currently bad at peak times. This is likely to push more traffic down the narrow lanes and towards Papercourt Lane
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse – something that all climate change forecasts suggest will become a major issue if removal of flood plain and run-off areas are removed
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no "exceptional circumstances” exist
- It will cause over-development of our village, with the proposed 400 additional homes being excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1 – when its gone its "gone" for good, and the Council has an obligation to preserve and protect for future generations
• It will join up Ripley and Send, thereby further eroding our separate identities, and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley. The traffic at peak times is already excessive, and is organically getting worse even before any development
• Other infrastructure will also be placed under excessive strain – from medical facilities to schools, as well as power, water and sewage – all of which have shown signs of strain in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1930  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock. The Old Portsmouth Road is regularly breaking up, and additional HGV traffic will exacerbate this, especially when couple with the other parts of the Plan
• It will join up existing villages, further reducing local identity and defeat the purpose of the Green Belt

I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:

• It is effectively an old non-conforming use in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions. Previous points regarding traffic impact on Tannery Lane, Papercourt Lane and the A247 apply here, and the addition of more HGV traffic will cause significant impact and generate a "ticking time bomb" for accidents
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I wish for all my objections to be taken into consideration.
Whilst not specific to a particular Plan clause, I would also like my strong objection registered to way that the Council has yet again handled this process, and how you continue to fail Guildford residents by failing to apply proper planning process.

Furthermore, and despite Send being responsible for a high number of the 32,000 objections to the 2016 plan, the Council appears to have ignored all the opinions of Send residents and proposed a plan which clearly ignores the norms and conventions of the local planning process. This should have seen a revised plan that took those opinions & objections into account, however the 2017 plan clearly shows the opposite and forces our area to disproportionally shoulder the burden to meet the understandable need for more housing.

This new plan targets valued green belt and completely ignores the inadequate infrastructure which is incapable of supporting such a large expansion of the settlement. The Council, in choosing to consistently ignore the ultimate and inevitable impacts, has shown at the least a woeful disregard for the resident’s needs, and worst an active and vindictive attitude towards Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5021  Respondent: 10805697 / Jill Kempster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.
• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham  
b) A331/A323 intersection  
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in my current house for 50 years and wish to make a plea re the fields, trees and hedges surrounding the village, which provide habitat for the abundant flora and fauna remaining and should be protected.

Nightingales migrated here annually to nest in the black [illegible word x2] until the late 1960’s, when activity – lorries etc. for the development of Old Cross Tree Way Estate, disturbed them, never to return.

Hedge-hogs are still resident here, (a declining species national), and many other birds, animals and reptiles, which I could list, but too numerous for this note.

Quality of life for humans, depends on wild life, greenspaces, and less traffic, congestion and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
Policy A29 Ament to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 6 & 8 Amend to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy A29 Ament to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 6 & 8 Amend to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/1349  Respondent: 10805761 / Russ McPhillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to you in respect of the Guildford borough Proposed Submission Local Plan: strategy & sites and include my comments and objections specifically relating to Ash Green.

Policy P3-Countryside and A29 (land to the south and east of Ash and Tongham.

Ash Green IS a rural area. We are next to Ash which is urban. Looking at the Ordnance Survey map you can see how built up Ash is. We are at extreme risk of loosing our rural identity as Ash is expanding with ever increasing development. With the proposed A29 policy this will merge the two areas of Ash and Ash Green together and we WILL loose part of Ash Green. How can it even be possible to take away part of the community area or divide a village?

Looking at the draft map where the blue line has been drawn, it segregates the greenest part of the village into the Ash and Tongham Urban Area (ATUA). This will destroy the rural part of Ash Green and we will loose that part of the countryside.

Ash Green is not part of the ATUA and the boundary must not extend south of Ash Green and Foreman Road.
Ash Green also has historical importance. The area of Ash Manor was originally a historical farmstead called Manor Farm and on old maps this was and should still be in Ash Green. The local plan even lists in it’s key considerations “the historical location of Ash Green”.

I have recently attended an open surgery with our local MP for Surrey Health, Michael Gove. We raised our concerns to him of the threat to our community by the GBC’s proposed Local Plan and the divide of Ash Green. He appeared very interested and assured us he was going to look into this further.

Aware that Mr Gove is also Environment secretary we stressed our concerns to him at the threat of loss to Ash Greens’ intrinsic rural character of it’s countryside location. We are also very close to the Surrey Hills Area of outstanding Natural Beauty (AONB).

To quote Michael Gove in June 2017 (Channel 4 news) on his new role as environment secretary.

“as environment secretary to do a job at the heart of government to enhance one of our greatest assets, which is our countryside.”

Our countryside does need protecting, we are slowly losing it to development. I am fully aware of the need for more housing and accept smaller scale and appropriate development in this area but even the council (as documented in their draft plan) suggests the need to support rural communities and to protect the remaining countryside.

I would like to object to the current wording in your policy of P3 and A29 (land to the south and east of Ash Tongham) as it does not give us any protection. I totally understand the need for new housing but it needs to be affordable for key workers and currently there are many new builds not being sold and in my opinion too expensive for such workers. Myself and my partner are key workers and would not afford the current prices of these new builds.

Please include in your Local Plan these revised paragraphs (as suggested by Ash Green Residents Association) for Policies P3, A29, and requirements 6 & 8 to protect Ash Green as a rural community from over development, ensuring appropriate infrastructure and recognising it’s historical location and intrinsic, rural character

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot. ”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Suggested amendments:

Please include in your Local Plan these revised paragraphs (as suggested by Ash Green Residents Association) for Policies P3, A29, and requirements 6 & 8 to protect Ash Green as a rural community from over development, ensuring appropriate infrastructure and recognising it’s historical location and intrinsic, rural character

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

**Comment ID:** PSLPP16/962  **Respondent:** 10805793 / Jean Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objections to Local Plan**

I object to this plan because the Council has no mandate to allow development in the Green Belt. The controlling Conservative group was elected in 2015 on a promise to protect the Green Belt.

I object to the removal of Ripley, Wisley, Clandon, Send, the Horsleys and many other villages from the Green Belt which will lead to the destruction of our rural villages.

I object to the plan because Guildford Borough Council shows little understanding of the countryside and of the heritage of the borough.

I object to this Plan which would damage the environment and character of the Borough.

I object to the disproportionate number of houses proposed for the locations North and East of Guildford.

I object to the lack of evidence for the proposed housing numbers -13860 -693 per year for 20 years. The assumptions on which the consultants prepared the SHMA have not been given to the public or to councillors.

I object to these housing figures as they were prepared pre-Brexit and must now be revised downwards. Independent assessments suggest some 300-325 houses per year would be adequate.

I object to Surrey University not building 2000+ units of student accommodation [for which it has permission] on its campus. This would free up family housing in the town.

I object to the proposed numbers also because the recognised constraints [eg 89% Green Belt, inadequate infra structure] have not been applied.

I object to the excessive density proposed for the major strategic sites.

I object to the impact of poor air quality on many of these major developments in breach of Air Quality Directives.
I object to lack of detail on financing of massive infrastructure eg roads and schools, which would be needed from Surrey County Council and the Highways Agency.

I object to the lack of information on how the new Hospitals and GP surgeries which will be needed will be funded.

I object to any villages being taken out of the Metropolitan Green Belt and swamped by significant housing development.

I object to the increased traffic congestion which will be caused on the M25, A3, other A roads and small rural roads.

I object to the ludicrous suggestion that many will resume walking and cycling-most journeys will require a car and public transport from the villages is poor.

I object to Three Farms Meadow [former Wisley Airfield] being removed from the Green Belt and included for housing. It is totally illogical to include this site which was comprehensively rejected for some 14 significant reasons earlier this year.

I object to developments at Blackwell Farm, Gosden Farm, Garlicks Arch and Wisley as this effectively merges all the villages along the A£ from the M25 to the Hogs Back with no provision for improvements to the A3 or local roads.

I object to the proposed SANG at Long Reach West Horsley which would be used to support some 1000 homes in a very small village.

I object to all sites in West Horsley where more than 5 houses are planned

I object to these sites within West Horsley

Manor Farm A

Bell and Colvill A37 –already rejected by the planning committee

Land at Ockham road North A39

Land at East Lane –A41

I object to these sites in East Horsley

Ockham Road North A39

Thatcher’s Hotel A36 –already rejected.

I object to these plans for the Horsleys which seem to be an attempt to create a small town.

I object to the failure of GBC to follow a “brownfield first” policy.

Finally I object to the document. In the form of 1,800 pages it is not user friendly and is out for consultation for only 6 weeks during the summer holiday period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/4187</th>
<th>Respondent: 10805889 / Bernard Corrigan</th>
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I’m writing to you regarding the proposal to remove Send village from the green belt, to which I strongly object, for the following reasons:

There are no special circumstances to justify abandoning the National Planning policy Framework. Also, the government and local councillors have given clear election promises to preserve the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/4173</th>
<th>Respondent: 10805889 / Bernard Corrigan</th>
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I object to further development at Clockbarn Nursery, accessed via winding Tannery Lane. More housing, and the resulting increase in vehicles, would only add to problem of the already hazardous road junction with Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the building of 400 houses and the use of several thousand metres of land at Garlick's Arch as industrial space. This is an area of ancient woodland, and is susceptible to flooding. Industrial outlets should be placed in a more suitable area such as Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to a new interchange with the A3 at Burnt Common. This would result in Send taking traffic from the proposed 2,000 new houses at Wisley, 2,000 houses at Gosden Hill and 1,850 at Blackwell Farm. Most of this new traffic to and from Woking/Guildford and A3/M25 would go through Send. Send Road, which is already over crowded would be gridlocked, and there would be the accompanying increase in pollution, which is already at excessive levels.</td>
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<td>I object to development of 40 houses and 2 traveller's sites at Send Hill. This is a narrow width, single access country lane, which is totally inappropriate for this use.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Access is via Tannery Lane and from either end the lane has extremely restricted access with hazardous junctions. Furthermore this is an intrusion into what is a lovely Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3042  Respondent: 10805889 / Bernard Corrigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy change for the following reasons, This is an area of permanent Green Belt where no "exceptional circumstances" exist. This is an area of ancient woodland, and will become even more susceptible to flooding if hundreds of houses are built on it. Where is the proven need for Travelling Showpeople at this location? This is a further attempt to over develop our village, causing the Green Belt that seperates Ripley from Send to disappear, defeating its very object. Excessive traffic would be an obvious problem for our local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3045  Respondent: 10805889 / Bernard Corrigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. It has ignored thousands of objections about Roads and Schools the school situation getting worse this summer many NOT GETTING ANY OF THE SIX SCHOOLS APPLIED FOR this year.

1. Since when has there been a demand for Travelling Showpeople the heavy traffic this will bring through our village small roads many places it is impossible for two large vehicles to pass.
1. This is a working greenbelt land there are a lot more brown land available also gives work to people if you get rid of all greenery between villages it will become a concrete jungle and grind to a halt on our roads.

1. We will be destroying our history as this ancient woodland that has been there since Elizabeth 1.

1. It has overhead cables which I believe is dangerous to build under plus it is prone to flooding.

6. The extra traffic will bring our small roads to a standstill as there is no room for widening and as pointed out already there are places two large vehicle can't pass

7. As for an on off access to the A3 it is on a bend and will cause many accidents that is the the reason Burnt Common Lane was blocked off many years ago

8. The A3 was built to bypass our villages and help to relieve us of this congestion this will be going backwards and build this excessive amount of houses we will come to a stand still.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3043  Respondent: 10805889 / Bernard Corrigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this "revised" policy. Having been deleted from the earlier draft in response to all the objection made, I most strongly object to this new application with the change of wording from “maximum” to “minimum” this policy would give free rein to planners to create another "Slyfield". While the aforesaid has plenty of sites and industrial units empty. Furthermore the Employment Land Need Assessment of 2017 shows a REDUCTION in demand of 3.9 hectares for industrial land for the WHOLE borough not this vast over allocation of 10 hectares at SEND, A GREEN BELT AREA. There would be an intolerable overload on our small roads, not to mention the accompanying increase in pollution, which is already at excessive levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3010  Respondent: 10805953 / Elaine Boyes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Firstly I am not happy at the fact that the word ‘Green’ of Ash Green was crossed out, even if it was an ‘error’. As part of the Ash Green community it has made me feel like we are worth nothing and our identity can be changed just like that. Well we can’t. We chose to live in ASH GREEN for a reason, because it is beautiful and like the name states ‘GREEN’. It is full of trees, greenery, wildlife. It is not Urban and it is not Ash.

As residents of Ash Green Road, we have deeds dating back to the early 1900’s with Ash Green clearly documented. The Ash Parish may have dealt with deeds but my legal, binding documents and deeds historically have Ash Green on them. That is because we were and are part of Ash Green.

Where the blue line has been added along the map of the area to draft a separation of Ash Green to ATUA it seems to have put the built up section of Ash GREEN into ‘Ash Green’ and the fields, trees, orchard, old farmsteads, rural part of Ash Green into ASH. It doesn’t make sense. Wouldn’t it make more sense to leave Ash Green as it originally was, a rural community with rural history. As already drafted in the Local Plan it needs to support the rural community. Even on page 213 of the local plan it lists in it’s key considerations ‘The historical location of Ash Green’.

Lets keep it that way, don’t chop it in half. Hundreds of us that live in this community are desperately worried that we will be segregated. It needs a more defining border that incorporates Ash Green Road and Ash Manor.

This objection may have strong undertones in it but the reason for this is, along with all my neighbours and fellow residents of Ash Green, we feel absolutely passionate that where we have been drafted, we should be put back into the original Ash Green. Please don’t separate us. We are a strong community, who love our village. As residents under the Guildford Borough Council, I would feel severely let down if where I live is put into an Urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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My next objection is to Policy A29: Land to the south and east of Ash and Tongham.

On this policy I want to object to the increase in the proposed number of homes of 1200 to 1750. Doing this will certainly join Ash Green Village to ATUA. This completely goes against Policy P3.

It also goes against the NPPF which identifies that there should be a limit to development in the countryside and that the rural communities should be supported. I therefore ask for the requirement 6 of this policy, which looks at protecting the ‘historic location of Ash Green’ is not good enough and needs to be reworded to give Ash Green more protection.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new
development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

To add to the amendments of policy A29, requirement 8 does not give sufficient protection to Ash Manor which is a historical farmstead constituting of 3 grade 2 listed buildings, of which the main house Ash Manor is a Medieval moated house dating back over 1000 years and is connected to Henry VIII.

It is also clearly stated in the NPPF of the need to conserve and enhance the historic environment and to recognise heritage assets as irreplaceable and protect them against any threats such as development.

To give this historical farmstead and heritage asset more protection there should be amendments to requirement 8 as follows.

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

It must be made a priority that there is adequate infrastructure in place before any development is allowed to proceed. This applies to Requirement 9, the proposed road bridge at Ash Staton and closure of level crossing.

This requirement also fails to address other infrastructure improvements in relation to transport that are needed to cope with increase of traffic that would be generated from any developments of A29. Solutions must be drawn up to address The Street in Tongham, A331/A323 intersection and A31/White Lane junction before any development of A29 can go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Suggested amendment to:

Requirement 6:
“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8:
“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:
I’d like to firstly object to **Policy P3, Countryside**.

Ash Green is not part of the Ash and Tongham Urban Area (ATUA). It is a rural community and historically always has been. Many old maps such as the Tythe Map and Ordnance survey maps dating back as far as 1871 shows the original Ash Green incorporating Ash Green Road and Ash Manor.

Ash Green is a rural area, you get that sense when you live, walk or drive around it. The roads, especially down Ash Green Road are narrow and rural. Ash Manor is indicated in Ash Green on the historical maps. This used to be a farm called Manor Farm. Also drafted into the ATUA and yet originally part of Ash Green, is the Old Farmhouse just down Drovers way. This was originally called Ash Green Farm. When looking at it all with historically 2 farms and farms are generally part of the countryside, this shows we are rural and must stay that way.

So as part of the countryside policy I would like to ask for the following amendments to 4.3.29, 4.3.30 and policy P3 as follows to keep Ash Green as a rural area and to not be dissolved into urbanisation.

- **4.3.29 Amend:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend:** (1) (c) to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

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Answer (if comment is on questions 1-7 of the questionnaire): ()
2. Policy A29: Land to the south and east of Ash and Tongham

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

1. Policy A29: Land to the south and east of Ash and Tongham (Cont.)

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

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Attached documents:
Comment ID: pslp171/2195  Respondent: 10806081 / R Kavanagh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy P3 - Countryside**

   - Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
   - **4.3.29 Amend to:** "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
   - **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
   - **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

   - 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
   - 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
   - Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: PSLPS16/6029  Respondent: 10806113 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to any development at Blackwell Farm. Green belt land and AONB should not be used for building. The council should be advocating the use of existing brownfield sites & insisting that areas which already have planning are developed, rather than continuing to sit vacant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15265  Respondent: 10806241 / Michael Shattock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of the village of Chilworth and surrounding villages from the Green Belt. This will guarantee that there is no protection against development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4299  Respondent: 10806369 / Michael Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, my wife and I together with many local friends and neighbours are hugely shocked and dismayed at the sheer extent of the proposed developments across the various sites in our immediate area; quite apart from the massive implications to the old Wisley airfield site which will also affect our villages. This last matter seems to have been raised again, notwithstanding your reservations.

We have lived in West Horsley for 34 years, schooled our children locally and have both worked locally too. We are members of various local care related organisations and commit much of our spare time to local charities as well as our Church. You could say that we have invested many years of time and energy into the well being of our local community, which we value hugely.

The proposed several developments of some 533 (plus a recent add-on of 60) houses together with 2100 houses plus service/leisure businesses at Wisley, is quite out of proportion to the nature of this area and far outside the scope of the the existing and developable infrastructure of roads, water services, drainage, schooling, medi-care. local amenities and the
huge increase in traffic demands it would create. Roads and the narrow lanes serving the area, drainage and the other services are already at maximum capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>Taking West and East Horsleys out of the Green Belt through insetting, is a monstrous proposal and looks to be a devious piece of methodology, certainly not worthy of Guildford Borough Council and the integrity of its valued Councillors. Our Borough and Parish Council representatives are better than this and would do well to resist the pressures from Central Government and developers to escalate local development through these proposals.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I further object to the proposals for Wisley airfield - the present road system is fighting to cope with the existing traffic in this popular area, the A3 is always very busy. Considerable thought needs to be given to the provision of a suitable road system BEFORE any building starts here.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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</table>
To the proposal to build 45 houses at Clockbarn Nursery, the road system is unsuitable for heavy traffic while building is in progress and for the additional housing and the Marina which has been approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2052  Respondent: 10806465 / Moya Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To the proposal to develop 40 houses & 2 travellers pitches at Send Hill. Send Hill is an affluent area, completely unsuitable for travellers pitches with the various transport they employ [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/88  Respondent: 10806465 / Moya Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal at Garlicks Arch for 400 houses will produce far too great a strain on the existing medical services which are stretched now.

The new Send school which will be for children from 5 - 11, is planned to absorb a specific number of children already in the area and will be unable to contend with the proposed population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object to the proposals laid down in the local plan:

We cannot absorb the population resulting from the planned development/s because:

The road system is at present stretched to accommodate traffic from the M25/A3/Ripley to Woking, using Sendmarsh Road and Send Road. The proposal of 400 houses & industrial units will mean the road to Woking will be permanently grid-locked and the condition of the roads will deteriorate. Traffic will use the roads which have proved they frequently need repairing now and so be a greater strain on Guildford financial sources.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I refer to my e.mail of 12th June which received an acknowledgement but no reply. This e.mail referred specifically to my objection to the local plan at Garlicks Arch and the proposed 400 houses & industrial area, on land which I understand is possible flood risk for the Sendmarsh area.

I wish to object further:

To the removal of Send from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Starting with A42 Tannery Lane

I object to the proposal to increase dwellings from 45 to 60.

You gave permission for the marina and we presumed this would mean an amount of extra buildings but NOT 60. The narrow roads from Send Road or Polesden Lane to access the proposed building land are completely unsuitable - services are stretched to bursting point and traffic which is at present extremely heavy will become impossible.

More objections are covered by A43.

**All the above building is planned on the GREEN BELT which goes against all the previous promises to keep England Green.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Now on to A43 Garlicks Arch

I object to the proposal to build 400 homes & 6 Travellers plots.

For starters, I say Travellers and I MEAN travellers - [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. Don't try and dissuade me from this idea, I have lived in this
area since 1965 and several times travellers have had to be evicted from the locality. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

Now, 400 homes?? Where are all their vehicles going to be able to access the main roads, A3 and Portsmouth Road?

Where are they going to be able to sign on at a medical centre? This is stretched at present serving existing patients. Where are their children going to school? Send has a very nice new school, able to cope with children from the ages of 5 - 11 - EXISTING NUMBERS. Where do you propose the 400 new homes children learn?

All the above building is planned on the GREEN BELT which goes against all the previous promises to keep England Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/519  
Respondent: 10806465 / Moya Miller  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now on to A58 Burnt Common.

I object to the proposal to utilise 7,000 sq.ft for industrial & warehousing.

Dont make this beautiful area into another Slyfield - that is what it would become and traffic would be worsened by the large lorries during daytime and early morning. Where do you propose they gain access? Dont say the new road plan will be sufficient to cater for it all.

Proposed Submission Local Plan: strategy and sites 2017 - Guildford Borough Council Planning Policy Consultations

All the above building is planned on the GREEN BELT which goes against all the previous promises to keep England Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2346  
Respondent: 10806561 / Deborah Stephens  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East horsley map I moved to East Horsley as a child, more than 30 years ago, and it was an idyllic village in which to grow up. During the intervening years, there have been huge changes and a great deal of development. The population has grown, and this has put pressure on the schools, doctors surgery and parking in the village and at the stations in East Horsley and Effingham Junction.

Now raising my own children in the village, the area is already very different and already much busier with large amounts of traffic shortcutting through the village roads to access the A3 and M25. Increasing the number of houses to this extent will create a lot more traffic and pollution. As the mother of a child with asthma, this is of huge concern to me. I do not believe there is any benefit for our community in building on our beautiful green spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4468  Respondent: 10806561 / Deborah Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A35 I object very strongly to building of any kind on the Wisley Airfield site. This is a location of historical interest, it is a haven for wildlife and building here would cause many problems for the local environment. This location has no immediate local facilities to support the new "community" which will be created. This will mean more overcrowding at the railway stations in East Horsley and Effingham Junction. More traffic and congestion on local roads and especially on the already crowded A3 and M25.

I believe we are custodians of the countryside and we have a duty to maintain them for our future and the welfare of our future generations.

Please do not allow building on our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9733  Respondent: 10806561 / Deborah Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 I object to the villages of East Horsley and West Horsley being removed from the Green Belt. I believe that the introduction of the Green Belt, was a policy introduced to protect the countryside, agricultural land, wildlife and its habitat, forestry and to prevent urban sprawl. I feel that the pressure to build houses, particularly in popular and "desirable locations" is making governments consider allowing these valuable measures to be set aside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/47  Respondent: 10806849 / Chris Duffy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having reviewed the proposed new plan I must reiterate my objection made previously in 2014. This does nothing to alleviate my concerns.

Swamping horsley worth over 500 new houses and continuing to push for a further 2000 homes on nearby Wisley airfield remains wholly inappropriate.

The village does not have sufficient access or amenities or character to cope with this increased demand and it would be irresponsible of Guildford council to approve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/48  Respondent: 10806849 / Chris Duffy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the scope of the draft local plan.

The impact on the residents and services of building 593 additional houses planned for the village of East and West Horsley will overwhelm the infrastructure of a small rural community.

We need to build some new houses to help young people get on the the housing ladder but an extra 593 in Horsley is too many.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/135  Respondent: 10806849 / Chris Duffy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Currently the Council still has to repair holes in the road that have been unattended since the winter of 2014. Telephone and internet connections have been frequently cut off. Repairs to the water supply has cut off supplies. Already the police are unable to cope with numerous robberies that occur each month and some children cannot get into the local school.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/797  Respondent: 10806881 / Fran Connolly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Borough Proposed Submission Local Plan: Strategy and sites: June 2016 with reference to impact on The West and East Horsely Villages.

- why are we building on GREENBELT land - this is land that has been protected so far for good reason. Why now should we be considering building on this land when there are surely other feasible sites which are not Greenbelt ?

- why are we planning to build additional houses in an area which is already saturated from a schools (Raleigh, Howard of Effingham running at capacity with waiting lists already.), from a medical perspective

- these are villages and do not have good enough roads, to cope with all this additional traffic
How can you put this plan forward without considering the impact on the local residents within the village or indeed what the impact will be if the houses were to be built. As part of the plan it must be seen that the houses are not built on Greenbelt Land and that if any new housing is erected on suitable (not Greenbelt land.) then increased infrastructure (eg schools, medical, roads, shopping, public transport) are also included.

I re-iterate that I strongly object to this plan for the above reasons and hope it will be denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1433  Respondent: 10806945 / Chris Lee  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5768  Respondent: 10806945 / Chris Lee  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the congestion that development will cause and the lack of road infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) as

1) I object to not protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/43  Respondent: 10806945 / Chris Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

I object to Green Belt, Policy 2 at paragraph 4.3.15 (Send Business Park) being taken out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/376  Respondent: 10806945 / Chris Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

I object to Green Belt, Policy 2 at paragraph 4.3.15 (Send Business Park) being taken out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A35 (former Wisley Airfield) due to the increase to 95.9 hectares. The volume of traffic and pollution levels around this site would be totally unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to Policy A42 (Cockburn Nursery) due to the increase of homes from 45 to 60 homes - a 33% increase.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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5) I object to the fact that infrastructure requirements have not been considered and our local schools and doctors do not have capacity to deal with so many additional houses. My children will not be able to get a place in their local secondary school if these developments go ahead without new schools being built.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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3) I object to the development at Garlick's Arch, Send Marsh, Burnt Common and Ripley (A43) as the land is currently in the Green Belt.

4) I object to the development of new houses at Garlick's Arch as there is no corresponding plan to improve the surrounding infrastructure, schools or medical facilities. The site is prone to flooding and is covered in ancient woodland and wildlife. This site was added at the last minute with no prior consultation and the additional housing is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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2) I object to the new interchange onto the A3 at Burnt Common (A43a) as it would cause huge traffic problems through Send and Clandon. The current roads are not wide enough for this volume of traffic, it is difficult currently to pass for large lorries and the road is not of sufficient quality to withstand the current traffic, let alone any increase. These roads are regularly used by large quantities of cyclists accessing the Surrey Hills, and in areas there is no pavement. There are two primary schools on these roads (Send and Clandon) and it would be exceptionally dangerous to increase the volume of traffic along these roads where children are crossing regularly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft 2016 draft local plan. [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

1) I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) as there are no exceptional reasons for doing so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2434   Respondent: 10807745 / Belinda Middleton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of Green Belt.

2) If this development proceeds, the narrow strip of Green Belt remaining between Guildford and West Clandon at this point will very likely be proposed for development in the future by the same developer who is promoting Gosden Hill.

3) The development will be highly visible from the A3 when approaching Guildford.

4) Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles north east from the centre of Guildford. Wisley village is 6½ miles and the M25 less than 8 miles from the centre of Guildford as the crow flies. They could all join up.

5) The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is already at a crawl every day during peak periods.

6) The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7) The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2439   Respondent: 10807745 / Belinda Middleton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 through West Clandon and Send will increase dramatically and unsustainably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2435  Respondent: 10807745 / Belinda Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The amount of land to be taken out of the Green Belt seems well in excess of the space needed to build 400 homes. What will be the fate of the excess land?

2) Garlick’s Arch (A43) is an unsustainable location. The nearest station is about 1.5 miles away and the bus services are infrequent. Residents will be dependent on cars.

3) There is no proven demand for travelling show people plots in this location.

4) Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. The development will cause additional traffic on the A3 and the A247 and B2215 in Ripley, Send and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2437  Respondent: 10807745 / Belinda Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1) This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

2) The Plan calls for a minimum of 7000 sq. m. (0.7 ha, previously in the 2016 Plan a maximum figure) but the proposal is to take 9.26 hectares out of the Green Belt. There is no proper justification given for taking the additional land.

3) The evidence base does not support this scale of additional industrial space and the justification for placing it in the Green Belt is not made out. If the quality of some existing industrial provision is not adequate this should cause redevelopment of it not a large encroachment into the Green Belt.

The 2017 Employment Land Need Assessment shows a demand of 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt.

4) The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.

5) The proposal for light industry, storage, distribution and waste management activities at Burnt Common will generate large amounts of traffic including heavy vehicles on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/850  **Respondent:** 10807745 / Belinda Middleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1) Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems.

2) Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in Appx. C to the Plan). Even if this happens the Plan admits …"we forecast that there will also be an absolute increase in overall traffic volumes". This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.

3) We can be sure however that the cumulative effects of the developments in the north east of Guildford will have a devastating impact on the A247 through the villages of West Clandon and Send. It is hard to see how any of the infrastructure proposals in the Plan (Appx. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is freely admitted by SCC that they have little money available.

4) The Plan now calls for nearly all infrastructure to be funded by developers (see Appx. C). I question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be challenged in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete, even assuming there are funds to provide it.
5) If development were to be refused the land would still have been removed from the Green Belt and its future rendered uncertain.

6) All of these developments will draw very large amounts of additional traffic to the A247. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to Gosden Hill schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

I would like to point out that although the A247 is classified as an A road, it has none of the characteristics because it:

- is less than 2 vehicles wide in places. Larger vehicles routinely mount the only pavement.
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge over the railway, with poor site lines
- has a dangerous junction to access the station
- has a dangerous and unlit junction with the southbound A3 on-slip road
- has a primary school accessed by narrow pavements
- is largely unlit
- is already very congested at times, more so when delays on the A3 are severe

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. I consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1) In the introduction to the Policy statement, numerous sites are taken out of the Green Belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, HM Prison Ripley Road, Send, and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the Green Belt.

2) It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the Green Belt, it is legitimate to move the boundaries. A blanket change to Green Belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.

1) The removal of Green Belt protection from the site of HM Prison, Ripley Road, means that it could come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/113  Respondent: 10807745 / Belinda Middleton  Agent: 


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1) The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.
2) The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247 through West Clandon.

3) The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the A247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools

It appears that the development includes a school in addition to 1100 houses. The school is not needed and is purely part of the developers plan to profit from houses and a school.
Detailed research has been carried out in an area around Normandy, Ash, Guildford, and Woking and it is abundantly clear that there is no need whatsoever for another school in the area, particularly in Normandy.

Ash Manor School is seriously understated, and, again has space to expand. The school is operating at only 57% of capacity.

Christ's College Schol also has a lot of spare capacity.

Guildford University Technical College, opening in 2018 will take over 450 pupils putting further pressure on the three schools listed above to search for more pupils to remain viable.

All the head teachers in the surrounding area are extremely concerned at the prospect of any more schools being built.

Roads

The proposed site is bounded by Westword Lane, Glaziers Lane (and those two roads are lanes) and the A323 Guildford Road.

Westword Lane has a narrow railway bridge over it which separates a give way/one way system. It works reasonably well at present but any further increase in traffic from the proposed development would cause dangerous problem.

Glaziers lane has an up-over bridge over the railway which drives approach 'blind' to oncoming traffic - potentially dangerous. The A323 Guildford Road is extremely busy now at peak times due to the major increase in traffic from Ash, Ash Green, Ash Vale and Aldershot from many new developments.

When there are accidents on the A31 Hog's Back and the A331 Blackwater relief road. Normandy becomes grid locked as it is the alternate rate for drivers to take.

Green Belt

In April 2016 the Government said 'There are no plans to relax the strong protection that prevent inappropriate developments on the Green Belt. The proposed development in Normandy is completely inappropriate, would destroy the village and convert it to a small town.

LEAVE IT AS GREEN BELT.

My Recommendation

I have lived in the Ash Vale/Normandy area for almost fifty years. There must be masses of W.D. or ex W.D. land available not of the Pirbright Road area between Normandy and Pirbright which would be highly suitable for a small number of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2623  Respondent: 10807841 / Bernard Stutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, I wish to support the Removal of site A46 1100 homes and school, and A47 50 homes and as the infrastructure i.e. roads, narrow railway bridge, sewage, flooding, electricity supply would be unable to cope. Also, it was proved by Keith Witham proved that there was no need whatsoever for a school in this area. In addition, these areas are in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1053  Respondent: 10807841 / Bernard Stutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
P2. The removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site as this could enable development within these areas at a much higher density than now. This is a wrong decision as it would impinge on the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6310  Respondent: 10807969 / Sarra Martin  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Clockbarn Nursey - Tannery Lane is too narrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6312  Respondent: 10807969 / Sarra Martin  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new interchange, for my reasons stated above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6308  Respondent: 10807969 / Sarra Martin  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
I would like to register my objection to the new set of plans for Guildford and the surrounding area.

As a dog walker, runner and horse rider, I am very unhappy about the change to the green belt. Why are we losing this valuable resource in which people can walk and exercise? Wellbeing and quality of life is hugely affected by the availability of green space and I feel abandoning it goes completely in the face of any Government drive to improve wellbeing and mental health - I think there was a very clear promise to maintain areas of the green belt. Building developments at Send Hill would impact on ancient woodland and nature again would be destroyed.

As a regular commuter and road user, I am also well aware of the pressures on the roads and A3. Send is already a funnel and pressure point and the increased traffic due to the extra houses seems to me to be a step too far. Many of the roads are single width and under pressure already. A new interchange would increase traffic in the whole area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/6309</th>
<th>Respondent: 10807969 / Sarra Martin</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the development at Send Hill, where an area of ancient and natural beauty would be destroyed.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to Policy A42 and the increase in the number of homes at Clockbarn in Tannery Lane. The increase to 60 homes will only increase access and traffic problems - Tannery Lane was entirely unsuitable to having 45 new homes, now you propose 60. The number of cars and increase in traffic is unsupportable on this lane - recent guidelines reducing the pollution to young people and the elderly due to idling engines will impact on vulnerable people living locally as well as to the schools in our area. Not only that, flooding is likely to increase, as well as the reduction of green belt. It seems you are determined to link up villages in the area, completely wiping out green belt. On this basis, I also object to Policy 2 (4.3.15), which removes Send Business Park out of the green belt. As a dog walker and nature lover - you are destroying recreational space and damaging what little wildlife we have left in the area. In addition I object to Policy A43, which now has 400 homes recommended for this site - This is permanent, historic green belt and covered by the no exceptional circumstances clause - the number of homes is huge and again, will impact heavily on the traffic in the area - traffic that is already a problem - creating a new access road onto the A3 will just add to the congestion in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I just wanted to write and register my objection to the latest draft of the local plan and its impact on Send village. As one of the previous objectors, I know that you had over 30,000 objections to the last iteration of this plan - yet the new amendments have done nothing to improve, or take into account the numerous problems that it will generate for the local area. It appears that Guildford Borough Council (GBC) has not taken into account any of the objections made during the last round of consultation - this appears GBC are just paying lip-service to public consultation.

Attached documents:

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<th>Comment ID: pslp172/821</th>
<th>Respondent: 10807969 / Sarra Martin</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 - why do we need additional industrial premises at Burnt Common, when I know that there are empty industrial units available in Guildford.

I urge you to please reconsider your approach to our local area. It seems you are set on destroying green belt and wiping out the character of Surrey villages, damaging wild life and reducing health and wellbeing, by removing green spaces in which to walk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/3124</th>
<th>Respondent: 10808833 / David Brandon</th>
<th>Agent: Vail Williams (Suzanne Holloway)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Vail Williams have been appointed by Mr David Brandon, as landowner to make representations on Guildford Borough Council Regulation 19 Submission Local Plan, June 2016. This representation focuses on Policy A26: Land adjacent to Blackwell Farm, and the full statement attached below seeks to demonstrate that our clients’ site, is deliverable, suitable and achievable for residential development in line with para 47 of the NPPF.

It is consider that the residential property and its curtilage, provides an opportunity to allocate the site for additional residential development, and would enhance the existing allocation, whilst providing a unique opportunity to enhance housing delivery without detriment to the surrounding area.

Examination

The site is considered to be deliverable, suitable and achievable. As Blackwell Farm can assist the delivery of housing, in a sustainable location, we would like to register our interest in participating at the Examination and attend any pre-examination meetings.

Please see covering statement for additional justification in regard to National and Local plan policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 Vail Williams have been appointed as planning agents for Mr David Brandon as landowner of Wellington House, Hogs Back GU3 1DE. This representation is our clients response to the Guildford Borough Council Regulation 19 Submission Local Plan, June 2016 which will guide development until 2033.

1.2 This representation builds on the submission at the Regulation 18 stage of the Local Plan in September 2014, reference DLPSA/3565, and relates to a 4.2 hectare residential site to the west of Policy A26 (site 60 as identified in site assessment documents) as allocated in Guildford Borough Council Local Plan Submission Plan (GBCLP). For site boundaries of the allocation and the proposed site see Appendix One.

1.3 This representation seeks to demonstrate that our clients’ site, is deliverable, suitable and achievable for residential development in line with para 47 of the NPPF and the opportunity to allocate the site for additional residential development, would enhance the existing allocation, and provides a unique opportunity to enhance housing delivery without detriment to the surrounding area.

2.0 SITE CONTEXT AND OPPORTUNITY:

2.1 The site comprises of one large U-shaped 2 storey residential property with access road and is surrounded by residential garden. To the west is a significant mature treescape that forms the boundary of the site, and a robust means of enclosure and natural boundary with the land to west, identified as greenbelt. The site has one owner and is available and suitable for residential development.

2.2 This site is adjacent to the Blackwell Farm allocation, a 78 hectare site which is approximately 500m from the settlement boundaries of Guildford town. To the South of the site is the A31 which forms the main access to the house, and is the primary access to the allocation to the north. There is a separate 2 storey residential property “The Gardens” immediately to the North.

2.3 This representation seeks to demonstrate that approx. 100-120 additional dwellings can be provided on the land adjacent to the primary access road at Wellington House, through the use of the residential house and its garden only. In this regard, a small scale extension to the proposed urban extension would result in only a 5.3% increase in site area, however the opportunity to deliver a more comprehensive development without undermining the context or character of the surrounding area can be achieved.

2.4 With a presumption in favour of sustainable development, this representation seeks to demonstrate how the objectives of the national policy framework (NPPF) and local planning policies (GBLP) can be consistent with the inclusion of the site into the strategic extension site under policy A26 at Blackwell Farm.

3.0 PREVIOUS POLICY CONSIDERATIONS & REPRESENTATIONS IN RELATION TO REGULATION 18

3.1 The site was previously proposed at the Regulation 18 stage on behalf of the landowner, Mr Brandon by planning consultants D&M Planning. The site is defined within the Guildford Borough Local Plan Proposal Map 2003 as being within the Metropolitan Green Belt and in an Area of Great Landscape Value (AGLV).

3.2 The site was proposed at Regulation 18 stage by the landowner with potential for residential development, in a sustainable location and adjacent to the strategic development site proposed by Guildford Borough Council. The site was identified as open countryside and abuts the proposed allocation. Despite numerous concerns raised by objectors regarding the impact on protection policies including the AONB and AGLV, including objections from Natural England, the site immediate adjacent to Wellington House at Blackwell Farm has been allocated as an extension to the settlement boundary and significant development was justified over and above greenbelt, character, agricultural, and access concerns.

3.3 At the Regulation 18 stage, 13,040 dwellings were required (652 per annum) as identified in the 2014 SHMA. The previous representation for Wellington House confirmed that this figure did not reflect the objectively assessed need for
housing (OAN) and the housing figures were therefore too low. This then considered alternative scenarios regarding higher growth need, including DCLG figures that proposed a much higher rate of 704 dwellings per annum.

3.4 It is considered that despite the previous representation, the site has not been adequately assessed as part of the land supply assessments, and the proximity to the allocated site and redefined settlement boundary warrants the additional 4.2 hectares, with a clear defensible boundary, to be added to the existing 78 hectare allocation under policy A26.

4.0 CONSIDERATIONS FROM THE EVIDENCE BASE FOR ALLOCATION AT PROPOSED SUBMISSION STAGE (REGULATION 19)

4.1 The Local Plan polices contained within the GBLP submission document, need to comply with the National Planning Policy Framework (NPPF). The plan must demonstrate that it is positively prepared, justified, effective, and consistent with national policy. It is agreed that these tests, relating to the evidence base are sound. However, there are a number of issues raised in regard to the specific assessment of the land supply available for residential development, given that the site at Wellington House has not been included in the site assessments or those housing supply figures cited in the Local Plan.

4.2 Since the Regulation 18 stage, the site allocated at Blackwell Farm has been reduced from circa 2000, to 1800 homes, and the site has been reduced from 106.2 hec to 78 hectare through the loss of land to the west of the access road. For original Regulation 18 Map, see Appendix Two.

4.3 The Local Plan in Policy S2 identifies 13,860 new homes over the plan period (equated to approx. 693 per annum over 20 year plan period). Historically delivery has been low for Guildford and whilst the plan identifies phased delivery from 2018/19-2022/2 with an increasing annual housing target, it is considered that based on delivery rates, the most effective method of ensuring housing targets are met would be to maximise the allocation and identification of sites. Wellington House ensures that this can be dovetailed with the delivery of key infrastructure, which is central to effective planning, and as identified in the Councils own Infrastructure Delivery Plan (June 2016).

4.4 The Land Availability assessment (Feb 2016) shows that the Blackwell Farm site is due for delivery years 4-15 for 1800 homes, with highest delivery per annum at 230 for years 11-15. It also identifies in the housing trajectory a deficit up to 2028.

4.5 Whilst the SHLAA, and SHMA and Local Plan seem to identify adequate land supply over the plan period, the historic delivery rates, and need to plan positively and flexibly to consider all opportunities for development, in line with para 47 of the NPPF, requires the council to consider and assess all sites. These should be available, achievable (with realistic prospect that housing will be delivered on the site within 5 years) and be viable. On this basis, it is argued that the site at Wellington House should be included as part of the site allocated in Policy A26, on the following grounds:

4.6 Achievable and Deliverable:
The site has only one owner, who has proactively proposed the site as both Regulation 18 and 19 stages of the local plan process, demonstrating positive engagement and consideration of the relevant policy considerations. It is therefore achievable and deliverable.

4.7 Suitable:
The constraints in regard to greenbelt have been removed for the site abutting Wellington House at Blackwell Farm on the basis that the scale and opportunity warrants exceptional circumstances. The additional 4.2 hectare site could increase this opportunity, and indeed already abuts the primary access road for the site, and therefore both the existing mature landscaping and access arrangements are established. Within the LAA, the allocated site at Blackwell Farm (page 428) site
reference 311, acknowledges that although the site is in the greenbelt, it partially adjoins the urban area. The small scale extension (approx. 5% increase) could warrant an additional 120 dwellings.

4.8 Again mature trees create a sense of enclosure as with the adjacent site proposed at Wellington House, providing a clear and defensible boundary with mature greenspace. The partial inclusion of the site in AONB and AGLV is acknowledged, however as the site is in a Low flood risk (Zone1) and as a residential house and garden has no Agricultural land classification, unlike the allocated site, the allocation of the house and its curtilage do not warrant such additional constraints.

4.9 The Sustainability Appraisal (June 2016) states in Box 6.5 the following:

- Blackwell Farm to the south-west performs relatively well as a site option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery of new strategic infrastructure (including a rail station) and enable an extension to the Surrey Research Park; and development would mostly avoid the loss of Green Belt identified as most sensitive (‘red-rated’) by the Green Belt and Countryside Study (GBCS; see Figure 6.4). As such, an urban extension here was identified as a 'given' for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,800 (o.e. a figure lower than that proposed in 2014, reflecting a reduction in the overall site size to avoid red-related Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV))32 was identified as a given, for the purposes of developing spatial strategy alternatives.

4.10 The Sustainability Appraisal therefore acknowledges that the location and principle of residential development in this location, and the scale of development is consistent with the principles of sustainable development. Para 6.4 of the SA identifies that the site at Blackwell Farm has medium green belt sensitivity. It is therefore considered appropriate in regard to the presumption of sustainable development that the same conclusions could be drawn against increasing the allocation to include Wellington House.

4.11 The Landscape Character Assessment that supports the Regulation 19 Local Plan identifies the site within the Hogs Back Chalk Ridge area B1- where development should have a positive benefit to landscape and have regard to the landscape area. It is considered that this can be addressed through sympathetic design, and use of the site as a blend and transition from the adjacent greenbelt to the site allocation at Blackwell Farm.

4.12 The principle of the assessment of the strategic site, the appropriateness of the development in regards to housing supply and the contribution to the wider priority in the provision of new homes, supports the allocation at Blackwell Farm being extended. The evidence base supports that the site is available, suitable and deliverable, and due to the single ownership of the site it should be considered that there is potential for development to be phased in line with policy approach from the larger strategic site, whilst enhancing housing supply within the early stages of the Local Plan.

5.0 CONSIDERATIONS FROM THE EVIDENCE BASE FOR ALLOCATION AT PROPOSED SUBMISSION STAGE (REGULATION 19)

5.1 The Spatial vision of the Local Plan looks to maintain the extent and function of the green belt in such a way to protect the character of the Borough. The vision then continues to explain that as not all of the development needs can be met within the urban areas, that it is proposed to “focus some development on large greenfield sites, which brings significant infrastructure, it help make it sustainable. In the context of Wellington House, the site would have additionality to this objective, and support the principal of maintaining the greenbelt whilst providing essential infrastructure in a sustainable location.

5.2 The vision also confirms that new development on the edges of existing urban areas will be required to treat the transition from urban to rural character in a sympathetic way, whilst affording great protection to the AONB and AGLV. Careful and considered design can ensure that the redevelopment of the additional 4.2 hectares, can assist in the transition between the allocation and the defined settlement boundary.

5.3 Policy S1 states that the Borough Council will work proactively with applicants jointly to find solutions so that proposals can be approved wherever possible. In this regard, Wellington House is suitable, and achievable fulling sustainable design objectives of the plan and aligning with the presumption in favour of sustainable development.
5.4 Policy S2 confirms the provision of 13,860 new homes, but accepts that “the housing target...is not a ceiling”. Table 1 shows delivery of Blackwell Farm as an urban extension spread across years 1-15, and the policy highlights the annual housing target rising from 500-790 per annum with a total delivery of 10,395. It has already been argued that Wellington House can ensure that as the site is within one ownership, the site can be brought forward in advance of the strategic site, ensuring a more flexible approach to delivery, whilst ensuring delivery throughout the plan period can address an early years deficit. (SHLAA p20)

5.5 Policy P1: Surrey Hills AONB is to be conserved and enhanced, whilst proposals in the AGLV will be required to demonstrate that they would not result in harm. It is proposed that careful design and layout, and containment within the defined boundaries of the site, that align with the western boundaries of the adjacent allocation, would ensure that there any development would not undermine any further the AONB or AGLV but would merely square off the site and allow the transition to be more consistent with the approach taken in Policy A26.

5.6 Policy P2 relates to the greenbelt. The NPPF which states that greenbelt boundaries should only be amended in exceptional circumstances, and given the significant requirement for housing, and the strategic nature of the site for additional employment and infrastructure provision, the Council has considered it appropriate to propose the urban extension site at Blackwell Farm. However, the additional land at Wellington House could also contribute additionality to the housing provision and therefore the same exception can be applied to the site.

5.7 Whilst the council intend to provide an SPD to amplify Policy P2, it is considered that the close relationship with the access to Blackwell Farm and the irregular shape of the existing allocation, is justification for the site to be included in the urban extension. Indeed, the site could be a buffer in regard to design and scale due to its character and typography, and this could then blend with the adjacent green belt. Careful and considered design can easily address this. As the site already has a large residential property within the site, the site has to a degree been previously developed and used, therefore there is a significant difference between the land and its residential curtilage and that of the adjacent open areas that more formally contribute to the green belt and its open character.

5.8 Policy P2 also argues that development on a site, within the green belt, for replacement buildings will look at the scale and proximity to existing buildings. Given the significant scale of the proposals at Blackwell Farm, it is considered that well designed additional residential dwellings on the adjacent site at Blackwell Farm can be justified in relation to the overall visual impact, and that the integrity of the greenbelt would not be undermined by “square-ing off” the urban extensions allocation in Policy A26. The additional land is therefore consistent with the council reasoned justification in para 4.3.26 which states that infill development should not have an adverse impact on the character of the countryside or the local environment.

5.9 Policy D1 of the submission Local Plan relates to design polices and making better places, and the need to create a harmonious integrated mix of uses. The unique opportunity to expand the scale of the urban extension allows the proposals for the new local centre, employment floorspace, SANG and housing to be enhanced. The site also contributes to the ability to further improve the opportunity for sustainable movement, whilst enhancing housing land supply figures in an already justified location.

5.10 The site at Wellington House would allow any residential development to “respond meaningfully and sensitively to the site, its characteristics and constraints”, whilst being laid out to make the best use of the natural features of the site. In regard to the proposed site, this relates to the opportunity to utilise the topography and natural landscape of the trees and existing mature boundary treatments, which are appropriate to their setting.

5.11 Policy A26 sets out the details of the allocation at Blackwell Farm for 1800 homes, 31,000sqm of employment space, 6 travellers pitches, comparison and convenience retail, community uses and a 2FE primary school. This significant development site abuts the Wellington House site and the shared access road is illustrated to as a primary vehicular access to serve the development. The allocation as it stands will significantly alter the character and setting of Wellington House and not including the site within the allocation ignores an opportunity to further enhance the objectives of sustainable development.

5.12 Other local plan policies:
The site does not have any other constraints that would preclude it from development potential. A planned development has the ability to address the raft of specific policies in relation to sustainable construction, open space provision, energy efficiency and all other local plan requirements through careful and considered design. The site should therefore be considered to be consistent with the NPPF and Local Plan policies.

6.0 Justification of including Wellington House, in line with the National planning context NPPF:

6.1 The NPPF (paragraph 14) states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

• local planning authorities should positively seek opportunities to meet the development needs of their area;
• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The inclusion of Wellington House seeks the opportunity to meet development needs, gives flexibility to the housing land supply whilst the benefits outweigh any harm, that has already been mitigated through the allocation at Blackwell Farm.

6.2 Para 15 states that “development which is sustainable should be permitted without delay.” The site is available and can be delivered without delay as issues relating to access, suitability and sustainability have been established in principle as part of the adjacent strategic land allocation.

6.3 Para 17 of the NNP requires Local Planning Authorities to empower local people to shape their surroundings” whilst allowing Local Plans to be “a creative exercise in finding ways to enhance and improve the places in which people live”. It states that every effort should be made to objectively identify and meet development needs.“ responding positively to opportunities for growth”.

6.4 It continues, that planning should “take account of the different roles and characters of different areas”. In regards to the Guildford Local Plan, if this has been adequately considered for Site A26, then the approach can be applied to Wellington House to further respect the character of the locality whilst allowing every effort to identify development opportunities.

6.5 The NPPF also encourages the use of previously developed land, whilst actively managing growth to make the fullest use of sustainable transport, and focusing development that can be made sustainable. Paragraph 30 encourages patterns of development that facilitate sustainable modes of transport. Focusing additional growth on the boundaries of the allocation would meet all of the Core Planning Principles of the NNPF, whilst opportunities for sustainable design and construction can be amplified in a larger scale scheme.

6.6 Paragraph 47 of the NPPF requires local authorities to “boost significantly the supply of housing”, and that developable sites should be identified. Through the identification of the Blackwell Farm as a key site, critical to the delivery of housing development over the plan period, Guildford Borough Council has accepted the principle of
development in this location, and has justified that this overrides the previous green belt allocation. It does not however identify Wellington House as developable.

6.7 The NPPF requires delivery to be realistic whilst Paragraph 50 also requires policies to be flexible over time. It is considered that due to historical levels of under delivery the inclusion of the additional 4.2 hectares will allow a flexible, realistic and achievable site to come forward, that can be self sufficient, or developed as part of the wider strategic allocation.

6.8 Paragraph 52 states that “the supply of housing can sometimes be best achieved through planning for larger scale development, such as new extensions to settlements.” Whilst the authority has illustrated this in Site 26 at Blackwell Farm it has not done this far enough, and the potential to include Wellington House, ensures that the opportunity “provides the best way of achieving sustainable development”.

6.9 Whilst paragraph 53 resists the use of residential gardens, when it is harmful. Given the scale of the curtilage of Wellington House, of 4.2 hectares and the close proximity to the large 78 hectare site at Blackwell Farm, it is consistent that the supply of additional dwelling houses within the residential curtilage would not cause harm, indeed it could be positively planned to ensure a more consistent approach to the setting and context of the wider site.

6.10 Paragraph 55 requires residential development to be innovative in design, raise design standards, significantly enhance its setting and be sensitive to the defining characteristics of the local area. Due to the defensible boundaries of the site, the unusual shape and form of the allocation at Blackwell Farm and the precedent given to the use of the access road leading to both Wellington House and Blackwell Farm, the opportunity to allow the residential house site to be developed as a buffer to the strategic allocation to the north, can ensure that this is achieved through careful design and layout, respecting the local character and context. This will ensure that the development complies with Paragraph 56 which requires development to establish a strong sense of place, and optimise the potential of the site to accommodate development, responding to local character.

6.11 Four of the five objectives related to greenbelt policy cited in para 80, are to protect the sprawl of built up areas, prevent towns merging, assist in the safeguarding the countryside from encroachment, and preserve historic towns. The principle of the allocation at Blackwell Farm ensures that these have been considered and assessed, against the overriding need for land for housing for period of the Local Plan.

6.12 The extension of the site to include Wellington House can therefore be agreed that the principles of adding an additional 4.2 hectares on a 78 hectare site (5.4% increase) would not undermine the gap between built up areas, nor create the merger of towns. The scale of the site, adjacent to the larger allocation does not result in any additional encroachment eastwards into the countryside, but merely squares off the site, along the already allocated access road that is the primary access to the allocated site A26. Given that the Council argues that the strategic allocation is consistent with para 83:”Greenbelt can be developed in exceptional circumstances” it is considered that the same can apply to extending the boundary to include the additional 4.2 hectares.

6.13 The inclusion of this site would ensure “consistency with the Local Plan Strategy in meeting identified requirements (para 85). This also requires that boundaries are “defined clearly using physical features that are permanent and readily recognisable”. The heavily tree lined eastern boundary, and the access road to the west, as well as the allocation to the south ensure that this site can be consistent with para 80 and “would not have to be altered within the local plan period”.

6.14 Para 89 requires any development not to have “greater impact on the openness of the greenbelt”. Given the site allocation to the south and the significant green boundaries to the site, it is unclear how any development within the residential curtilage can be adversely impacting on the openness of the greenbelt, over that already proposed by the large allocation at Blackwell Farm.

7.0 CONCLUSION:

7.1 The opportunity to expand the allocated site at Blackwell Farm will be consistent with the ethos and vison of the Submission Guildford Borough Plan and assist the Council in achieving its objectives without any detriment to the significant constraints in the Borough regarding impact on the open countryside and greenbelt. In line with the NPPF the
site can contribute to sustainable development and the three dimensions of social economic and environmental roles. It complies with Para 7 by providing housing supply that meets the needs of present and future generations, within a high quality environment, with accessible local services. Economically it will allow the co-ordinated provision of necessary infrastructure when considered alongside the urban extension allocation A26, and environmentally, it can ensure a strengthened boundary and blend between the Blackwell Farm strategic site and the adjacent green belt, contributing to the protection and enhancement of the natural and built environment.

7.2 The benefits to the inclusion of the site at Wellington House into the Strategic urban extension can be summarised as:

- The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
- It is appropriate, and available for development.
- Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development in line with the NPPF.
- Increased housing provision from approx 100-120 residential units (depending on design and infrastructure requirements), and associated CIL receipts.
- Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the local plan.
- To provide additional residential units in a sustainable location that is in close proximity to both proposed and existing local centres and the urban boundary.
- To utilise a site that has already been deemed sustainable in regards to sustainable transport.
- To enhance a site that has already been released as an exceptional circumstance from the greenbelt.
- The opportunity to design the residential layout that can sufficiently blend with adjacent greenbelt and ensure a more successful transition between the new strategic scale development within the urban extension.
- Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and shape of the existing allocation, without detriment to the integrity of the greenbelt.

7.3 It is therefore recommended that the site at Wellington House be included in the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and, when considered against the “whole plan approach”, can contribute towards achieving the objectives of a sound local plan, which can guide successful development in Guildford until 2033.

APPENDIX ONE:

Site Boundaries and Site Plan

[IMAGE 1]

APPENDIX TWO:

Regulation 18: Draft Local Plan Strategy and sites. Original site boundary for 106.2 hectares.

http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=17346&p=0

[IMAGE 2]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- IMAGE 2 Suzanne Holloway.png (545 KB)
- IMAGE 1 (Suzanne Holloway).jpg (172 KB)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Please see attached statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)

Comment ID: SQLP16/1045  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)

Comment ID: SQLP16/1046  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Please see statement below

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The site is suitable, available, and deliverable.

Given the opportunity to assist the delivery of housing, in a sustainable location, we would like to register our interest in participating at the Examination and attend any pre-examination meetings.

Please see covering statement for additional justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Please see attached statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3299  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Vail Williams have been appointed by Mr David Brandon, as landowner to make representations on Guildford Borough Council Regulation 19 Submission Local Plan: strategy and sites (2017).

This representation builds on the preceding representations made in June 2016 to the previous Reg. 19 stage of the proposed Local Plan 2015-2034.

There have been a number of changes and alterations to the proposed plan particularly in terms of decreasing overall housing numbers, by approximately 1,400 dwellings overall to 12,462 from 13,860, in the most recent version of the proposed local plan reg. 19 (June 2017). The plan states in paragraph 4.1.9a that this total annual housing target is lower than what is set out in the LAA 2016 “as having potential to be delivered over the plan period” so that there is flexibility in the plan and it is demonstrable that the “strategy is capable of delivering the target”. However, given the total housing target the Council should be increasing these numbers to ensure that their OAN, along with the unmet need across the Housing Market Area (HMA), are met.

According to a recent HBF response to the Guildford Borough Council Proposed Submission: Strategy and Sites 2017 Consultation “the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of the neighbouring authorities”. For example, Woking continue to plan using their currently adopted Core Strategy which sets figures at 225 units below the OAN set out in the 2015 West Surrey Strategic Housing Market Assessment. Guildford, similar to Waverley, therefore has a duty to cooperate to aid Woking in meeting their unmet need.

The same issue was also discussed recently at Waverley Borough Council’s Examination in Public (EIP) where the Inspector determined that Waverley, and Guildford, should be increasing their housing targets to accommodate Woking given that they are all in the same HMA.

This representation focuses on Policy A26: Land adjacent to Blackwell Farm, and the full statement attached below seeks to demonstrate that our clients’ site, is deliverable, suitable and achievable for residential development in line with paragraph 47 of the NPPF.
It is considered that the residential property, and its curtilage, provides an opportunity to allocate the site for additional residential development, and would enhance the existing allocation whilst providing a unique opportunity to enhance housing delivery without detriment to the surrounding area.

In addition, the most recent changes to the proposed local plan has seen the overall plan period being decreased to 19 years, from 2013-2033, to 2015-2034; there has been a loss of overall strategic sites with the removal of the Normandy and Flexford site from the plan which was set to deliver some 1,100 new homes across the plan period. These changes in reducing housing numbers, reducing the overall time period of the plan and reducing the number of strategic sites, while the need for housing has not decreased but may, in fact, have increased due to the Borough’s duty to cooperate to help the overall HMA and Woking specifically to help meet their need, illustrate that further sites will need to come forward in order to deliver enough houses to meet the needs of the overall area within the plan period.

Despite the Guildford Borough Topic Paper 2017 on Housing Delivery which sets out the reasons for reducing their housing targets due to the allowance of the NPPF and NPPG for the Borough to lower their targets where adverse impacts of providing housing on constraints such as the AONB, Green Belt and Infrastructure Capacity would “significantly and demonstrably outweigh the benefits” of providing new housing (pg.8-9).

The demand for the additional housing need still exists and can be accommodated in sites such as Wellington House which will, overall, have a less harmful impact on the surrounding area and Borough due to its location adjacent to the Blackwell Farm strategic site, than other stand alone sites which may come forward, as it fits in and creates a stronger defensible boundary between the built up area and the open countryside, does not decrease the open gap between Guildford and Ash/Tongham any more than already proposed, and will not have infrastructural transport issues as these have already been mitigated within the Blackwell Farm proposal.

Within this most recent Regulation 19 plan proposal, further weight appears to be put on defensible boundaries with the Green Belt, seeing multiple sites allocated for development in the plan changing to amend their boundaries to make them more defensible. The inclusion of the Wellington House site into Policy A26 would “square-off” the strategic site and create a more natural boundary to the site which would be a hard line edge between the built up area and the Green Belt.

The site at Wellington House is currently developed as a residential site, being a large house and garden, and therefore constitutes as a Brownfield site on which development would be more suited to than those green field sites that are also being put forward. Therefore, the inclusion of this site would create less of an overall impact on the Borough and surrounding area than an undeveloped Green Belt site.

While it is acknowledged that this site is currently designated as Green Belt and there were large numbers of comments and objections (some 3,313) to the Green Belt policy in the local plan, the removal of this site and inclusion into policy A26, would “square-off” the site and create that defensible boundary which would be more suitable for development in the area than alternative stand-alone sites, as aforementioned.

The proposed transport infrastructure plans outlined in document T13 show that major improvements are to be made to the A31 along the Hogs Back in conjunction with policy A26. Given that Wellington House and Blackwell Farm share an access point, it makes further sense that Wellington House be included in this allocation rather than the additional housing provision be found elsewhere as the necessary infrastructure provisions associated with this type of development have already been planned for and will not need to be provided as they would on a different site.

In summary our representation is as follows:

- The site is owned by a single landowner who has had a consistent approach to putting this site, which, in line with the NPPF, is available, deliverable and viable, forward for consideration since 2014.
- The Landowner has been fully engaged in the process of promoting this site from the beginning.
- The site is fully suitable, appropriate, and available for development immediately or in the future.
- If this site at Wellington House is not allocated for development under Policy A26, it may come to be a vacant and unused site in the future due the impacts such a large strategic site will have on the amenity use of the dwelling.
• There is an increased need to deliver housing numbers for the adjacent LPAs in line with the HMA and the
determination by a planning inspector that Waverley take on half of Woking’s unmet need and suggestion that
Guildford share the burden of providing some of this remaining need also.
• The number of houses delivered by the Borough is historically poor and Guildford Borough Council need to
recognise the need to be flexible and release additional sites which will not create a negative impact on the
surrounding environment or Green Belt, such as this Wellington House site.

With this, the benefits to the inclusion of the site at Wellington House into the strategic urban extension of policy A26 can
be summarised as:

• The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
• It is appropriate, and available for development.
• Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development
in line with the NPPF.
• Increased housing provision from approx. 100-120 residential units (depending on design and infrastructure
requirements), and associated CIL receipts.
• Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the
local plan.
• To provide additional residential units in a sustainable location that is in close proximity to both proposed and
existing local centres and the urban boundary.
• To utilise a site that has already been deemed sustainable in regards to sustainable transport.
• To enhance a site that has already been released as an exceptional circumstance from the Green Belt.
• The opportunity to design the residential layout that can sufficiently blend with adjacent Green Belt and ensure a
more successful transition between the new strategic scale developments within the urban extension.
• Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and
shape of the existing allocation, without detriment to the integrity of the Green Belt.

Based on a new and updated evidence base, it is therefore recommended that the site at Wellington House be included in
the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and,
when considered against the “whole plan approach”, can contribute towards achieving the objectives of a sound local plan,
which can guide successful development in Guildford until 2034.

Examination

The site is considered to be deliverable, suitable and achievable. As Blackwell Farm can assist the delivery of housing, in a
sustainable location, we would like to register our interest in participating at the Examination and attend any pre-
examination meetings.

Please see covering statement for additional justification in regard to National and Local plan policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3300  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is
Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1 Introduction

1.1. Vail Williams have been appointed as planning agents for Mr David Brandon as landowner of Wellington House, Hogs Back GU3 1DE. This representation is our clients’ response to the Guildford Borough Council Regulation 19 Submission Local Plan, July 2017 which will guide development until 2034.

1.2. This representation builds on previous submissions for the site as part of the submission at the Regulation 18 stage of the Local Plan in September 2014, reference DLPSA/3565, and the 2016 representation to the Regulation 19 stage previously submitted.

1.3. This site relates to a 4.2 hectare residential site to the west of Policy A26 (site 60 as identified in site assessment documents as allocated in Guildford Borough Council Local Plan Submission Plan (GBCLP). For site boundaries of the allocation and the proposed site see Appendix One.

1.4. This representation seeks to demonstrate that our clients’ site, remains deliverable, suitable and achievable for residential development in line with para 47 of the NPPF. It provides Guildford Borough Council with the opportunity to allocate the site for additional residential development, enhancing the existing adjacent allocation at Blackwell Farm, whilst providing a unique opportunity to improve housing delivery without detriment to the surrounding area.

2 Site Context and Opportunity

2.1. There is a large U-shaped 2 storey residential property, an access road, and a large residential garden within this site, along with significant mature treescape which bounds the site and forms a natural boundary with the Green Belt land to the west. The site has one owner and is available and suitable for residential development.

2.2. This site is adjacent to Blackwell Farm, the strategic housing allocation (policy A26), which is a 78ha site located approximately 500m from the Guildford town settlement boundary. The A31 lies to the south of the site and acts the main access to the house, along with being the primary access to the Blackwell Farm allocation to the north. There is also a separate 2 storey residential property “The Gardens” which lies immediately to the North of the site.

2.3. This representation seeks to demonstrate that approximately 100-120 additional dwellings could be provided on the land, adjacent to the primary access road at Wellington House, through the use of only the residential house and its garden. In this regard, a small scale alteration to the proposed urban extension would result in only a 5.3% increase in site area. We propose that the opportunity to deliver a more comprehensive development which does not undermine the context or the character of the surrounding area could be achieved at this site with minimal impact to the surrounding area.

2.4. With a presumption in favour of sustainable development, this representation seeks to demonstrate how the objectives of the national policy framework (NPPF) and proposed local planning policies (GBLP) could be consistent with the inclusion of this site into the strategic extension site of Blackwell Farm under policy A26, and that the Borough Council should amend the Policy A26 boundary.

3 Previous Considerations & Representations in relation to regulation 18

3.1. This site was previously proposed at the 2014 Regulation 18 stage and the 2016 Regulation 19 stage on behalf of the landowner, Mr Brandon, by planning consultants D&M Planning and Vail Williams respectively. Within the Guildford Borough Local Plan Proposal Map 2003 the site is designated as Metropolitan Green Belt and is in an Area of Great Landscape Value (AGLV).

3.2. As outlined in the previous representation, the site was proposed at Regulation 18 stage by the landowner with the potential for residential development, in a sustainable location and adjacent to the strategic development site proposed by Guildford Borough Council. The site was, at that stage, identified as open countryside and abuts the proposed allocation. Despite numerous concerns raised by objectors regarding the impact on protection policies including the AONB and AGLV, including objections from Natural England, the site immediate adjacent to Wellington House was allocated as an extension to the settlement boundary and significant development was justified over and above greenbelt, character, agricultural, and access concerns.
3.3. At the Regulation 18 stage, 13,040 dwellings were identified as required (652 per annum) as set out in the 2014
SHMA. The first representation for Wellington House confirmed that this figure did not reflect the objectively assessed
need for housing (OAN) and that the housing figures were therefore considered too low. This then considered alternative
scenarios regarding higher growth need, including DCLG figures that proposed a much higher rate of 704 dwellings per
annum.

3.4. It is considered that despite this previous representation, and the subsequent 2016 representation, this site at Wellington
House has not been adequately assessed or considered as part of the land supply assessments. With this, the proximity to
the allocated site and redefined settlement boundary warrants the additional 4.2 hectares, with a clear defensible boundary,
to be added to the existing 78 hectare allocation under policy A26.

4 Updated Comments as a result of the evolving Evidence Base and the Regulation 19 Proposed Plan.

4.1. In line with the NPPF, the plan must demonstrate that it is positively prepared, justified, effective, and consistent with
national policy. Whilst our previous representations reiterated that it is agreed that these tests relating to the evidence base
are sound, there are a number of issues raised in regard to the specific assessment of the land supply available for
residential development, given that the site at Wellington House has not been included in the site assessments nor those
housing supply figures as now amended, that have been cited in the July 2017 version of the Regulation 19 stage Local
Plan.

4.2. Since the Regulation 18 stage in 2014, the site allocated at Blackwell Farm has been reduced to 1,500 homes being
delivered within the plan period, from approximately 2,000 homes. With this, the site has been reduced from 106.2 to 78 ha
through the loss of land west of the access road. For original Regulation 18 map, see Appendix Two.

4.3. The July 2017 update of the Local Plan shows that Policy S2 relating to housing supply, now identifies a decreased
figure of 12,426 new homes over the plan period (a level of 654 per annum, which has been reduced from 693 per annum,
according to the 2017 SHMA addendum). Historically, the delivery of housing has been low for Guildford and whilst the
plan identifies phased delivery from 2019/20-2023/4 with an increasing annual housing target, it is considered that based on
delivery rates, the most effective method of ensuring housing targets are met is through maximising the allocation and
identification of sites.

4.4. The inclusion of Wellington House would ensure that this can be dovetailed with the delivery of key infrastructure,
which is central to effective planning, and is identified in the Councils own Infrastructure Delivery Plan (June 2016).

4.5. Based on the Land Availability Assessment 2016 (LAA) and the study on the 2015 West Surrey Strategic Housing
Market Assessment (SHMA), the requirement for housing based on demographic led projections meant that 517 dwellings
would be needed per annum (Table 76 - SHMA). The fully considered OAN of 693 homes per annum equated to a total of
10,985 new dwellings over the period of the plan. This highlighted the significant need for new housing in Guildford and
the dominance it has within the wider West Surrey HMA.

4.6. Since this, a 2017 Addendum to the SHMA has been released which indicates that due to economic circumstances the
housing need for the Borough should be reduced from the original 693 dwellings per annum to 654 dwellings per annum on
the basis that the new housing target has been reduced to what has been deemed a suitable figure for the Borough when
standing alone, apart from the rest of the West Surrey HMA.

4.7. Given the issues of delivery, as a member of the HBF, we have seen sight of their representations responding to this
proposed submission, which also states that the housing requirement reductions are unjustified and would cause the plan to
become unsound. They also note that this 2017 SHMA addendum has been commissioned by Guildford Borough Council
only and solely looking at their needs, without taking into account the wider needs of the West Surrey HMA. Vail Williams
LLP are therefore concerned that the plan does not reflect an adequate duty to cooperate.

4.8. The Land Availability Assessment Addendum (June 2017) shows that the Blackwell Farm site is due for delivery years
4-15 for 1500 homes within the plan period, with highest delivery per annum being 170 new dwellings per annum across
years 11-15. The housing trajectory also identifies a deficit in development up until the year 2025 (p8).

4.9. However, whilst the original and amended SHLAAAs, SHMAs and Local Plans seem to identify adequate land supply
over the plan period, this is only for Guildford itself with the housing trajectory figures having been decreased overall to
provide flexibility for the Council within their LAA allocations. This does not take into account the need for the wider area, particularly Woking’s unmet need. However, the historic delivery rates, and need to plan positively and flexibly to consider all opportunities for development, in line with para 47 of the NPPF, requires the council to consider and assess all sites. These should be available, achievable (with realistic prospect that housing will be delivered on the site within 5 years) and be viable.

4.10. On this basis, it is argued that Wellington House should be included as part of the site allocated in Policy A26, on the following grounds:

**Achievable and Deliverable:**

4.11. The proposed site remains in single ownership, who has proactively proposed the site at both Regulation 18 and, the prior, 19 stages of the local plan process demonstrating positive engagement and consideration of the relevant policy in order to show that this site is both achievable and deliverable.

**Suitable:**

4.12. While the Green Belt constraints remain across this site, it has been removed for the immediately adjacent Blackwell Farm site on the basis that the scale and opportunity of its development warrants exceptional circumstances.

4.13. Therefore the additional 4.2 hectare Wellington House site could increase this opportunity for much needed development. With this, the site already abuts the primary access road for the Blackwell Farm, and therefore both the existing mature landscaping and access arrangements are established. Within the LAA 2016, the allocated site at Blackwell Farm (page 428, ref. 311), acknowledges that although the site is in the Green Belt, it partially adjoins the urban area.

4.14. Additionally, the existing mature trees create a sense of enclosure as with the adjacent site proposed at Wellington House. This provides a clear and defensible boundary with mature greenspace which would fit into the Blackwell Farm allocation and would make the defensible boundary stronger. With this, other sites such as Ripley and Burnt Common have had their boundaries amended in this July 2017 Local Plan to ensure they are more defensible in the Green Belt. This is not consistent with Wellington House and Blackwell Farm.

4.15. The partial inclusion of the site in the AGLV is acknowledged, however as the site is in a Low flood risk (Zone1) and as a residential house and garden has no Agricultural land classification, unlike the allocated Blackwell Farm site, the allocation of Wellington House and its curtilage do not warrant such additional constraints. It is also considered that as PDL land with existing buildings, the land should be considered over and above other loss of green belt sites proposed.

4.16. The Sustainability Appraisal (June 2016) states in Box 6.5 the following:

'Blackwell Farm to the south-west performs relatively well as a sit option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery of new strategic infrastructure (including a rail station) and enable an extension to the Surrey Research Park; and development would mostly avoid the loss of Green Belt identified as most sensitive ('red-rated') by the Green Belt and Countryside Study (GBCS; see Figure 6.4).31 As Such, as urban extension here was identified as a "given" for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,800 (i.e. a figure lower than that proposed in 2014, reflecting a reduction in the overall site size to avoid red-rated Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV))32 was identified as a given, for the purpose of developing spatial strategy alternatives.'

4.17. As discussed in the previous Regulation 19 submission representation, the Sustainability Appraisal acknowledges that the location and principle of residential development in this location, along with the scale of development, are consistent with the principles of sustainable development. Paragraph 6.4 of this appraisal also identifies that the Blackwell Farm site’s Green Belt sensitivity is at a medium scale. Therefore, in regard to the presumption of sustainable development, it is considered appropriate that the same conclusions could be drawn against increasing the Blackwell Farm allocation to include Wellington House.

4.18. While this site is located within the Metropolitan Green Belt and there have been a large array of comments on Policy P2 relating to the Green Belt and its protection (3,313 comments), no significant changes are proposed to be made to Policy P2. However, Wellington House’s removal from the Green Belt and inclusion into the policy A26 would further
consolidate the defensible boundary of this urban extension and would provide a stronger boundary between the urban area and the Metropolitan Green Belt while providing a suitable site for additional housing supply to meet the overall need for Guildford and the HMA, and not creating additional harm to the character of the area or the infrastructure available.

4.19. As the site is ideally located adjacent to a proposed strategic site and the appropriateness of the development in regards to housing supply and its rich contribution to the provision of new homes, Guildford Borough Council should therefore support the allocation at Blackwell Farm being extended to include Wellington House.

4.20. The Guildford Borough Transport Strategy 2017 (ref. T13) associated with the Regulation 19 proposed Local Plan shows plans to update the A31 at the entrance to the Blackwell Farm strategic site. These plans include a “new signalised junction from Blackwell Farm site to A31 Farnham Road” (ref. LRN3), an “access road at Blackwell Farm site with link to Egerton Road” (ref. LNR4), and “Interventions to address potential highway performance issues resulting from development at Blackwell Farm site” (ref. LNR5), along with significant bus networks being introduced to serve the site (ref. pg.16). These vital upgrades to the infrastructure serving the Blackwell Farm strategic site provide further reason for the Wellington House site to be included, as it will mean that Wellington House will not need significant additional infrastructural upgrades in order to be viable and sustainable. This again should be considered in context with other proposed sites that will need further infrastructure investment.

4.21. The evidence base and the recent addendums to the LAA (ref. T11a), SHMA (ref. T26a) and Transport Strategy (ref. T13) all support that the site is available, suitable and deliverable, and due to the single ownership of the site it should be considered that there is potential for development to be phased in line with policy approach from the larger strategic site, whilst enhancing housing supply within the early stages of the Local Plan.

5 Wider Policy Compliance with Regulation 19

5.1. As iterated in the June 2016 Representations, the Spatial vision of the Local Plan looks to maintain the extent and function of the green belt in such a way to protect the character of the Borough. The vision then continues to explain that as not all of the development needs can be met within the urban areas, that it is proposed to “focus some development on large greenfield sites, which brings with it significant infrastructure, (and) helps to make it sustainable”.

5.2. In the context of Wellington House, the site would have additionality to this objective, and support the principal of maintaining the Green Belt whilst providing essential infrastructure in a sustainable location. The loss of Green Belt is a highly contentious issue with some 3,313 comments and objections received last year relating to Policy P2, as aforementioned. The consolidation of extra, well needed, sites such as Wellington House joining with Blackwell Farm in Policy A26, would allow the Green Belt to be saved elsewhere and remain as robust as it is intended to be.

5.3. The vision of the proposed Local Plan also confirms that new development on the edges of existing urban areas will be required to treat the transition from urban to rural character in a sympathetic way, whilst affording great protection to the AONB and AGLV. It is therefore suggested that Wellington House, through careful and considered design would ensure that the redevelopment of the additional 4.2 hectares would help to more appropriately address the transition to the newly defined settlement boundary and will “not compromise the overall character of the Borough”.

5.4. Policy S1 relating to the Presumption in favour of sustainable development, states that the Borough Council will “work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible”. In this regard, Wellington House is suitable and achievable, as it fills sustainable design objectives of the plan and aligns with the presumption in favour of sustainable development given its location in relation to the Blackwell Farm strategic site and proposed access.

5.5. While paragraph 4.1.4 has added in that “when implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development” which includes the presumption of sustainable development not automatically applying to policies relating to Local Green Belt, AONB, designated heritage assets, etc. However, the location of Wellington House in relation to the urban area extension for Blackwell Farm (Policy A26) should be presumed to be sustainable despite its designations, given that the nature and reasons for sustainability being applied to Blackwell Farm should also apply to Wellington House. Should Blackwell Farm allocation progress without Wellington House, then the circumstances and relationship of the existing residential development adjacent to the new allocation will also be significantly altered.
5.6. Policy S2 confirms the new lower provision of 12,426 new homes from the previous 13,860 homes, but accepts that “the housing target...is not a ceiling”. The Reasoned Justification for this lower number is stated in the Regulation 19 plan to be “lower than the total supply of homes identified in the Land Availability Assessment [2016] as having potential to be delivered over the plan period” so that there is flexibility in the plan and so that it is demonstrable that the Council’s “strategy is capable of delivering the target” (paragraph 4.1.9a of Regulation 19 Plan). However, in doing this, the OAN for the entirety of the West Surrey HMA along with Woking’s unmet need have not been considered, meaning the Guildford Borough Council are in fact failing their Duty to Cooperate and therefore making this plan unsound.

5.7. To confirm that the recent HBF representation (July 2017) to the Local Plan, “policy S2 could be considered out of date from the point at which the plan is adopted” as the 2017 LAA Addendum identifies 881 new dwellings fewer than required to meet the housing target, including the potential backlog of dwellings between 2019/20 and 2023/24, based on the trajectory set out in policy S2.

5.8. It has already been argued that Wellington House can ensure that as the site is within one ownership, it can be brought forward in advance of the strategic site, ensuring a more flexible approach to delivery, whilst ensuring delivery throughout the plan period can address an early years deficit until 2023 (LAA 2016, p20).

5.9. Policy P1 states that the Surrey Hills AONB is to be conserved and enhanced, whilst proposals in the AGLV will be required to demonstrate that they would not result in harm.

5.10. It is proposed that careful design and layout, due to the defined boundaries of the site (aligning with the western boundaries of the adjacent allocation) that the proposed site would not undermine any further the AONB or AGLV but would merely “square-off” the site and allow the transition to be more consistent with the approach taken in Policy A26.

5.11. Policy P2, which has not changed in the most recent update of the plan, relates to the Green Belt. It is stated in the NPPF that Green Belt boundaries should only be amended in exceptional circumstances. Given that there is a significant requirement for housing within the Borough, and that the site is strategic in nature for additional employment and infrastructure provision, the Council has considered it appropriate to propose the urban extension site at Blackwell Farm. However, it is maintained that the inclusion of land at Wellington House could also contribute additionally to the housing provision and, therefore, the same exception should be applied to the Wellington House site.

5.12. The Council states in the proposed plan that they intend to provide a Green Belt SPD which will amplify Policy P2. With this, it is considered that the close relationship with the access to Blackwell Farm, along with the irregular shape of the existing allocation, is justification for the site to be included in the proposed urban extension in Policy A26, and that whilst the site could be a buffer in regard to design and scale due to its blend with the adjacent Green Belt, careful design could easily address this.

5.13. As stated in the June 2016 representations, as Wellington House already has a large residential property within the site, the nature of the site is previously developed and therefore there is a significant difference between the land and its residential curtilage and that of the adjacent open areas that more formally contribute to the Green Belt and its open character.

5.14. Policy P2 also argues that development on a site in terms of replacement buildings, within the green belt, will take the scale and proximity to existing buildings into account. Given the significant scale of the proposals at Blackwell Farm, it is considered that well designed additional residential dwellings on the adjacent site at Wellington House can be justified in relation to the overall visual impact, and that the integrity of the Green Belt would not be undermined by “square-ing off” and infilling the urban extensions allocation in Policy A26. Therefore, this additional land is consistent with the reasoned justification provided by the Council in paragraph 4.3.26 which sets out that infill development “is considered to be the development of a small gap in an otherwise continuous built-up frontage”, “should be appropriate to the scale of the locality”, and should “not have an adverse impact on the character of the countryside or the local environment”.

5.15. The proposed plan appears to put weight on defensible boundaries and appear to have amended the boundaries of some strategic sites in order to be more defensible between the built up area and the surrounding Green Belt land. This can be seen with sites such in Ash (Policy A28), the Former Wisley Airfield (Policy A35), and the Garlick’s Arch, Send/Burnt Common site (Policy A43) to name a few. These were all amended in order to make the Green Belt boundary more defensible according to the reasons for change within the 2017 Key Summary Changes document.
5.16. Given these amendments, it could also be shown that the boundary of the strategic Blackwell Farm site policy A26 could be amended to include Wellington House and, as aforementioned, “square-off” the allocation which would create a more natural, harder, and more defensible boundary between the site and the Green Belt without causing additional harm to the Green Belt and the character of the area, while increasing the number of suitable, available and achievable sites required to meet the OAN for the entire HMA.

5.17. As stated in the previous representations, Policy D1 of the submission Local Plan relates to design polices and place shaping and the need to create a harmonious integrated mix of uses. The unique opportunity to expand the scale of the urban extension allows the proposals for the new local centre, employment floorspace, SANG and housing to be enhanced, and the ability to enhance further the opportunity for sustainable movement whilst enhancing housing land supply figures can be achieved in an already justified location.

5.18. The inclusion of the Wellington House site would allow any residential development to “provide a harmonious, integrated mix of uses, where appropriate, that fosters a sense of community and contributes to inclusive communities that provide the facilities and services needed by them” (Policy D1). Despite part of this policy being deleted since 2016, the site at Wellington House would respond meaningfully and sensitively to the site, its characteristics and constraints, whilst being laid out to make the best use of the natural features of the site. This relates to the opportunity to utilise the topography and natural landscape of the trees and existing mature boundary treatments of the proposed site, which are appropriate to their setting.

5.19. Policy A26 sets out the details of the allocation at Blackwell Farm for 1500 homes, 30,000sqm of employment space, Gypsy and Traveller pitches, comparison and convenience retail, community uses, a 2FE primary school, and a new secondary school. This significant development site abuts the wellington house site and the shared access road is illustrated to as a primary vehicular access to serve the development. The allocation as it stands will significantly alter the character and setting of Wellington House and not including the site within the allocation ignores an opportunity to further enhance the objectives of sustainable development.

5.20. The inclusion of Wellington House under the A26 strategic site allocation, contrary to design, would have a great impact on the overall wider local plan given its suitable, achievable, available and sustainable location which would create a stronger defensible boundary with the Green Belt, provide significant aid in terms of meeting additional housing need, and create minimal additional impact to the overall character of the town and Borough.

Other local plan policies:

5.23. Other key documents which form an integral part of the evidence base to this proposed local plan include the LAA Addendum (2017), the SHMA Addendum (2017) and the Strategic Highways Assessment Report (2017).

5.24. The LAA Addendum 2017 (ref. T11a) outlines that Blackwell Farm was reduced in capacity due to a revised understanding of the site’s potential capacity. This is sited within reasons for many of the LAA site amendments, and overall has decreased the number of proposed houses in the plan period despite their need remaining. This site at Wellington House has the potential to provide additional housing which would help meet the need across the Borough as well as the wider HMA, particularly Woking’s unmet need, which the Waverley EIP inspector has advised Waverley and Guildford share.

5.25. The five year housing land supply as of the 1st April 2017 set out in this document is also stated to be 2.36years. This is not sufficient and does not meet the requirements set out by the NPPF for each Council to demonstrate that they can provide. Further to this, the inclusion of this site would aid in the increasing of this housing land supply figure and meeting the Council’s duty to adhere to national policy.

5.26. The SHMA Addendum 2017 (ref. T26a) seeks to provide an updated assessment of the Objectively Assessed Need (OAN) in the Guildford Borough. The decrease in housing need for the Borough from 693dpa to 654dpa due to changing
economic figures, according to the recent HBF representation, should not necessarily mean that the Council should have reduced their housing numbers as employment forecasts are uncertain and consideration needs to be given for job growth in other areas within the HMA. This addendum takes Guildford into account as a standalone Borough, which in reality, does not produce realistic housing need figures, as the HMA needs to be assessed together as a whole. Wellington House is a site which is ready and available to come forward to take some of the housing numbers outstanding in the plan with as minimal impact to the character of the surrounding Green Belt as possible.

5.27. The Guildford Borough Transport Strategy 2017 (ref. T13) sets out a programme of schemes for transport related infrastructure required and planned in relation to proposed schemes and site allocations throughout the plan period. It is noted that there are significant improvements to be made to the A31 around the Blackwell Farm and Wellington House site entrance. These include new signalised junctions (LRN3), links to Egerton Road (LRN4), interventions to prevent potential highway performance issues resulting from development of the site (LRN5), and significant bus network improvements and additions (BT6). These are all planned improvements to the transport infrastructure associated with the Blackwell Farm site and the inclusion of the Wellington House site allocation would further increase the suitability and achievability of the site as these essential infrastructure improvements are already planned for provision.

5.28. There are no other constraints on this site that would preclude it from development potential. A planned development would be able to address the raft of specific policies in relation to sustainable construction, open space provision, energy efficiency and all other local plan requirements through careful and considered design. The site should therefore be considered to be consistent with the NPPF and Local Plan policies.

6 Justification of including Wellington House, in line with the National Planning Context NPPF

As stated in the previous local plan representations;

6.1. The NPPF (paragraph 14) states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

• Local planning authorities should positively seek opportunities to meet the development needs of their area;
• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The inclusion of Wellington House seeks the opportunity to meet development needs, gives flexibility to the housing land supply whilst the benefits outweigh any harm that has already been mitigated through the allocation at Blackwell Farm.

6.2. Paragraph 15 states that “development which is sustainable should be permitted without delay.” The site is available and can be delivered without delay as issues relating to access, suitability and sustainability have been established in principle as part of the adjacent strategic land allocation.

6.3. Paragraph 17 of the NNP requires Local Planning Authorities to empower local people to shape their surroundings whilst allowing Local Plans to be “a creative exercise in finding ways to enhance and improve the places in which people live”. It states that every effort should be made to objectively identify and meet development needs “responding positively to opportunities for growth”.

6.4. It continues, that planning should “take account of the different roles and characters of different areas”. In regards to the Guildford Local Plan, if this has been adequately considered for Site A26, then the approach can be applied to Wellington House to further respect the character of the locality whilst allowing every effort to identify development opportunities.

6.5. The NPPF also encourages the use of previously developed land, whilst actively managing growth to make the fullest use of sustainable transport, and focusing development that can be made sustainable. Paragraph 30 encourages patterns of development that facilitate sustainable modes of transport. Focusing additional growth on the boundaries of the allocation
would meet all of the Core Planning Principles of the NNPF, whilst opportunities for sustainable design and construction can be amplified in a larger scale scheme.

6.6. Paragraph 47 of the NPPF requires local authorities to “boost significantly the supply of housing” and that developable sites should be identified. Through the identification of the Blackwell Farm as a key site, critical to the delivery of housing development over the plan period, Guildford Borough Council has accepted the principle of development in this location, and has justified that this overrides the previous green belt allocation. It does not however identify Wellington House as developable.

6.7. The NPPF requires delivery to be realistic whilst Paragraph 50 also requires policies to be flexible over time. It is considered that due to historical levels of under delivery the inclusion of the additional 4.2 hectares will allow a flexible, realistic and achievable site to come forward, that can be self sufficient, or developed as part of the wider strategic allocation.

6.8. Paragraph 52 states that “the supply of housing can sometimes be best achieved through planning for larger scale development, such as new extensions to settlements.” Whilst the authority has illustrated this in Site 26 at Blackwell Farm it has not done this far enough, and the potential to include Wellington House, ensures that the opportunity “provides the best way of achieving sustainable development”.

6.9. Whilst paragraph 53 resists the use of residential gardens, when it is harmful. Given the scale of the curtilage of Wellington House, of 4.2 hectares and the close proximity to the large 78 hectare site at Blackwell Farm, it is consistent that the supply of additional dwelling houses within the residential curtilage would not cause harm, indeed it could be positively planned to ensure a more consistent approach to the setting and context of the wider site.

6.10. Paragraph 55 requires residential development to be innovative in design, raise design standards, significantly enhance its setting and be sensitive to the defining characteristics of the local area. Due to the defensible boundaries of the site, the unusual shape and form of the allocation at Blackwell Farm and the precedent given to the use of the access road leading to both Wellington House and Blackwell Farm, the opportunity to allow the residential house site to be developed as a buffer to the strategic allocation to the north, can ensure that this is achieved through careful design and layout, respecting the local character and context. This will ensure that the development complies with Paragraph 56 which requires development to establish a strong sense of place, and optimise the potential of the site to accommodate development, responding to local character.

6.11. Four of the five objectives related to greenbelt policy cited in para 80, are to protect the sprawl of built up areas, prevent towns merging, assist in the safeguarding the countryside from encroachment, and preserve historic towns. The principle of the allocation at Blackwell Farm ensures that these have been considered and assessed, against the overriding need for land for housing for period of the Local Plan.

6.12. The extension of the site to include Wellington House can therefore be agreed that the principles of adding an additional 4.2 hectares on a 78 hectare site (5.4% increase) would not undermine the gap between built up areas, nor create the merger of towns. The scale of the site, adjacent to the larger allocation does not result in any additional encroachment eastwards into the countryside, but merely “squares-off” the site, along the already allocated access road that is the primary access to the allocated site, A26. Given that the Council argues that the strategic allocation is consistent with paragraph 83: “Green Belt can be developed in exceptional circumstances” it is considered that the same can apply to extending the boundary to include the additional 4.2 hectares.

6.13. The inclusion of this site would ensure “consistency with the Local Plan Strategy in meeting identified requirements (paragraph 85). This also requires that boundaries are “defined clearly using physical features that are permanent and readily recognisable”. The heavily tree lined eastern boundary, and the access road to the west, along with the allocation to the south, ensure that this site would be consistent with paragraph 80 and “would not have to be altered within the local plan period”.

6.14. Paragraph 89 requires any development not to have “greater impact on the openness of the Green Belt”. Given the site allocation to the south and the significant green boundaries of the site, it is unclear how any development within the residential curtilage of this site could be adversely impacting on the openness of the Green Belt, over that already proposed by the large allocation at Blackwell Farm.
7 Conclusion

7.1. As previously iterated in the preceding representations, the opportunity to expand the allocated site at Blackwell Farm will be consistent with the ethos and vision of the proposed Guildford Borough Local Plan and will assist the Council in achieving its objectives without any detriment to the significant constraints in the Borough regarding impact on the open countryside and Green Belt.

7.2. In line with the NPPF, the site can demonstrate sustainable development along with the three dimensions of social, economic and environmental roles. It complies with Paragraph 7 by providing housing supply that meets the needs of both present and future generations, within a high quality environment, with accessible local services. Economically, the site will allow the coordinated provision of necessary infrastructure when considered alongside the urban extension allocation A26, and environmentally, it can ensure a strengthened boundary and blend between the Blackwell Farm strategic site and the adjacent Green Belt, contributing to the protection and enhancement of the natural and built environment.

1. The site is owned by a single landowner who has had a consistent approach to putting this site, which, in line with the NPPF, is available, deliverable and viable, forward for consideration since 2014.
2. The Landowner has been fully engaged in the process of promoting this site from the beginning.
3. The site is fully suitable, appropriate, and available for development immediately or in the future.
4. If this site at Wellington House is not allocated for development under Policy A26, the site will be significantly impacted, through the adjacent large strategic site and this will have a detrimental impact on the amenity use of the dwelling.
5. There is an increased need to deliver housing numbers for the adjacent LPAs in line with the HMA and the determination by a planning inspector that Waverley take on half of Woking’s unmet need and suggestion that Guildford share the burden of providing some of this remaining need also. This is not met in this current plan.
6. The number of houses delivered by the Borough is historically poor and Guildford Borough Council need to recognise the need to be flexible and release additional sites which will not create a negative impact on the surrounding environment or Green Belt, such as this Wellington House site.

7.3. With this, the benefits to the inclusion of the site at Wellington House into the strategic urban extension of policy A26 can be summarised as:

- The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
- It is appropriate, and available for development.
- Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development in line with the NPPF.
- Increased housing provision from approx. 100-120 residential units (depending on design and infrastructure requirements), and associated CIL receipts.
- Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the local plan.
- To provide additional residential units in a sustainable location that is in close proximity to both proposed and existing local centres and the urban boundary.
- To utilise a site that has already been deemed sustainable in regards to sustainable transport.
- To enhance a site that has already been released as an exceptional circumstance from the Green Belt.
- The opportunity to design the residential layout that can sufficiently blend with adjacent Green Belt and ensure a more successful transition between the new strategic scale developments within the urban extension.
- Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and shape of the existing allocation, without detriment to the integrity of the Green Belt.

7.4. Based on a new and updated evidence base, it is therefore recommended that the site at Wellington House be included in the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and, when considered against the “whole plan approach”, can contribute towards achieving the objectives of a sound local plan, which can guide successful development in Guildford until 2034.

[See attachment for Appendices]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch {A43} which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to...
failure to correct for errors in the historical data for international migration flows,
issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable!

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5609  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 -2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 - A247 near shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

• 15 April 2016 12 year old boy injured in The Street - A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and sec is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100,B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5610  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY A43 AND A43a - Garlick's Arch**

I OBJECT to Policy A43 and A43a on Garlick's Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when
required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so-called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/11061  Respondent: 10809377 / Bernice Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11062  Respondent: 10809377 / Bernice Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11045  Respondent: 10809377 / Bernice Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
### POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11047  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11049  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of localservices and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11064  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford.

Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

- To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

- To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourist. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

- To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

- To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11055  Respondent: 10809377 / Bernice Williams  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1

I OBJECT to Policy H1 -Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability.

Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11056  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

13. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11063  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

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1. **POLICY H3**

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued...
to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.) The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11051  Respondent: 10809377 / Bernice Williams  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/11052  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY 12

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11054  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY 13

I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever.

Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "...the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions. Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11067  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

- I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

- The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

- Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First, I believe constraints should have been applied.

Secondly, I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

- Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF's most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing.

Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016) / further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view,

"West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask

the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).
Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree that the evidence used for the Proposed Submission ocal Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (e.g. from Guildford Residents' Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant. In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1371  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

- "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt" Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.
- Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
- The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
- Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
- The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
- GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
- GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
- GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which, many, including independent assessors, consider unsound.
- Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
- Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
• The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
• The draft Local Plan will cause further linear development along the A 3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
• The proposal for Garlick's Arch was added to the draft ocal Plan without any prior consultation under Regulation 1
• The and Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and
• No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
• In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
• The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
• Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
• Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been
• The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1373  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/13530  **Respondent:** 10810145 / R Cope  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming an conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/491  **Respondent:** 10810881 / William Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3415  Respondent: 10811169 / Mollie Storrar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

I object to the proposal to significantly increase the housing numbers and hence population of East Horsley, without
concrete proposals to improve the village infrastructure to take account of that increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3414  Respondent: 10811169 / Mollie Storrar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been resident in East Horsley for about 25 years and I have carefully considered the Plan which you have made
available for comment.

Green Belt
-I object to the proposal to inset East Horsley from the Green Belt. This proposal runs against the Borough's own stated policy P2 in which is quoted "we will continue to protect the Metropolitan Green Belt".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3336  Respondent: 10811233 / David Storrar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

-I object to the proposal to significantly increase the housing numbers and hence population of East Horsley without concrete proposals to improve the village infrastructure to take account of that increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3335  Respondent: 10811233 / David Storrar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been resident in East Horsley for about 25 years and I have carefully considered the Plan which you have made available for comment.

-I object to the proposal to inset East Horsley from the Green Belt. This proposal runs against the Borough's own stated policy P2 in which is quoted "we will continue to protect the Metropolitan Green Belt".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5870  Respondent: 10811361 / Simon Crago  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two-way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5871  Respondent: 10811361 / Simon Crago  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 and A43a on Garlick’s Arch.

The site is not a sustainable site being far from any infrastructure facilities and transport links.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce, defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed.

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would have an enormous impact on local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11894  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the old and established woodland that surrounds the site on two sides and runs centrally through the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11891  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sustainable employment policy (Policy E1).

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs are likely to be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11892  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floor space (Policy E2).

It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11893  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages, yet the development at Garlick’s Arch (A43) would result in the loss of some existing successful rural businesses, which have been in existence for many years. These businesses employ dozens of people. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy I1 due to the increased congestion that the development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I believe the additional traffic flows will bring increased numbers of accidents, and increase in noise, pollution and injury of the public. In the case of West Clandon, the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy P2, due to the congestion that development will cause to the trunk roads, A3/M25.

Significant improvements to the road infrastructure are likely to be many years away, even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11889  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2, due to the congestion that development will cause to the trunk roads, A3/M25.

This policy does not sufficiently safeguard the Green Belt and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas.

In addition, I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. Exceptional circumstances are required for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

I believe that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
### Comment ID: PSLPP16/11897  **Respondent:** 10811361 / Simon Crago  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints.

There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/11890  **Respondent:** 10811361 / Simon Crago  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to development in areas which are at risk of flooding (Policy P4).

Building in higher flood risk areas merely adds additional strain on existing emergency services when the inevitable floods occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/11887  **Respondent:** 10811361 / Simon Crago  **Agent:**
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11888  Respondent: 10811361 / Simon Crago  Agent:

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4731  Respondent: 10811361 / Simon Crago  Agent:
C.i. Policy 25 Gosden Hill

1. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

2. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.

3. The development of this site will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

4. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

5. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

6. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which I understand is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4732  Respondent: 10811361 / Simon Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

2. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

3. The allocation of 28.9 ha is an excessive land grab into the Green Belt.

4. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

5. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

6. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

7. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

8. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

9. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure. Our villages are already suffering from severe congestion for much of the day. The proposed development under the plan will cause greater congestion in and around our villages.

10. Many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

11. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

12. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

13. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

14. I object to the lack of proper infrastructure planning for sites. Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

15. Despite the Garlick’s Arch site being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

16. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Any further development without funding will place further stress upon existing health services.

17. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). I have considerable concerns that development of the large residential sites identified at Wisley Airfield, Garlick’s Arch and Gosden Hill will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

18. I object on the grounds of poor air quality. The significant level of development being proposed will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

19. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley. Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

20. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
C.iii. Policy A58 Burnt Common

1. I object to Policy A58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
3. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
4. The impact on small surrounding roads will create traffic gridlock.
5. It will join up existing villages and defeat the purpose of the Green Belt.
6. It will create poor air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

E. Policy S1 Presumption in favour of Sustainable Development

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are urban sprawl. Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Duty to Cooperate

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/296  Respondent: 10811393 / Frank Anayi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Reference to A44 Land west of Winds Ridge and Send Hill.

I do not consider this to be a good location for the proposed development for the following reasons:

1. I understand the site has unsafe land fill waste which may not be suitable for building on.

2. The site is opposite a cemetery.

3. Send Hill is a very narrow road and may not be suitable for extra vehicular access and is congested at the other end near the traffic lights during school times.

4. Access to Send Hill is through either Potters Land or Vicarage Lane on the south side. Both Vicarage Lane and Potters Land are quite narrow and may not cope with large volume of traffic. Exiting the A3 to Potters Lane after the farm shop there is a nasty bend that at the next bend oncoming traffic have to give way to traffic coming from the A3 but there is no give way road marking, the road is very narrow and some of the hedges from houses have overgrown onto the road. Potters Lane require hedge trimming constantly but it doesn't seem to be done properly.

5. I object to large scale development particularly on Green Belt. Send is a nice village and we would like to keep it as a village.
Thank you

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/297  Respondent: 10811457 / Mary Anayi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Reference to A44 Land west of Winds Ridge and Send Hill.

I object to location of the proposed development site for the following reasons:

1. Road congestion. Approaching Send Hill from Potters Lane from the A3 would bring through lots of vehicles through a dangerous bend after the farm shop that vehicles heading to the A3 cannot see what is coming through. There is no Give way sign or road marking to indicate that two cars cannot pass each other at that bend. Furthermore approach to Send Hill from Vicarage Lane is very narrow and cannot cope with large volume to traffic.
2. Send Hill itself is very narrow and very congested at the other end near the traffic lights especially during school times.
3. The site is opposite the Cemetery.
4. I understand that the site has unsafe land fill waste and may cause harm to new residents in newly built houses.
5. Send Village is in the middle of Green belt land and I would not like to see the Green Belt land being used to build on.

Thank you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9551  Respondent: 10811553 / J.D. Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As I have written before.
The Doctors are overworked now. How will they cope with hundreds more!
Car parking is not easy.
Roads already busy.
Schools are having problems.
I object to being removed from the Green Belt.
I chose to move here I like it as it is.
Why overcrowd the area and spoil the district?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/2966  **Respondent:**  10811681 / Linda Knight  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

10. I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/3765  **Respondent:**  10811681 / Linda Knight  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I strongly object to the plans to build 595 new houses in the Horsleys and also the development of over 2,000 houses on the former Wisley Airfield. I moved to this area 20 years ago precisely because I wanted to live in a small rural environment. It was not an inexpensive choice, but I decided to spend my hard earned money to purchase a house in a location that I loved. Building such a large number of houses in and around Horsley Village will completely change the character of the village. In addition, it will create new problems such as over-crowding on the local train service and associated parking area. This plan does not take into consideration the welfare of the individuals who already reside in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6041  Respondent: 10811681 / Linda Knight  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Riplev (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6040  Respondent: 10811681 / Linda Knight  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 10811681 / Linda Knight</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1–7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1–7 of the questionnaire): ()

12. I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1–7 of the questionnaire): ()
3. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads. This is currently a rural area and many no roads have no suitable pedestrian footpaths or safe crossing points. I have made complaints about the dangers of these roads to pedestrians and that the lack of footpaths discourages healthy means of transport like cycling and walking and the situation will not be improved by more cars and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
11. I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. In particular there is a real lack of public transport with recent cuts to local bus services, there is no train stations in the area of the proposed development and the local roads which are already under strain will do not have plans for improvement. As a doctor I am concerned about the lack of medical services in the area. There are also insufficient leisure services with no plans to expand local sports centres in spite of the planned increase in residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. I object to the local plan as the development proposed is not sustainable (Policy S2)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/690  Respondent: 10811745 / Ann and David R. Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Jacobs Well

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to comment on the Local Plan with particular regard to Jacobs Well and area.

We object to the removal of Jacobs Well from the Green Belt creating a presumption in favour of infilling in the village.

We object to the figure of 693 houses per annum being the forecast of Guildford Borough Council to build in and around Guildford and especially on Green Belt land. Even with the infrastructure improvements promised, can this number of houses be justified or sustainable.

We object to flood plains near Jacobs Well being used for roads and houses such as the Clay Lane Link Road. The flood plains are there for a purpose to preserve Guildford town from being flooded and local areas.

We fully agree with GBC decision not to include the field owned by Cassidy Slyfield in SARP.

Thank you for considering these comments on the Guildford Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/843  Respondent: 10811745 / Ann and David R. Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

Traffic congestion, which is already severe, is set to get worse over the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send, I am writing to object to the proposed development of Green Belt land at Garlick's Arch, Burnt Common & to Land West of Wind's Ridge & Send Hill.

Send ward has been allocated 485 new homes under Guildford's revised Local Plan, an population increase of over 25%.

I strongly object to the removal of Send from the Green Belt. It is vital that this land is not built upon & it is totally unnecessary as most housing required could be built on brown field sites.

The Green Belt was established after the Second World War to limit the urban development. Remove it & Woking & Guildford will merge in to one huge city. Guildford Borough's own vision states it envisages Guildford as "A county town set in a vibrant rural environment". Well, that will no longer be true & Guildford & its surrounding villages will no longer be such a desirable place to live! Our roads at peak times are already struggling to cope with the volume of traffic. Send's school & doctor's surgery are also full, we simply do not have the infrastructure to support such a huge number of proposed additional houses.

I believe that the required 13,860 houses in the local plan is exaggerated. The number of foreign students living in Guildford have been wrongly used to inflate the need. Also, if the population is to grow by some 20,000 in the plan period, we actually only need 8,000 new homes (based on 2.5 people per home) & 50% of these could be built on brown field sites.

I strongly object to Policy A43, land at Garlick's Arch designated for 400 houses & 7,000sq m of industrial & warehousing units. This site is a late addition to the plan & was put through under Regulation 19. This significant development requires full consultation under Regulation 18 as it has not been previously consulted upon. This is green belt land covered by ancient woodland & protected by NPPF. There are no exceptional circumstances.

The proposed industrial development here is simply not required. The latest ELNA shows an 80% reduction in land required for employment floor space, since the previous draft plan. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. The A247 would be gridlocked all day & the surrounding roads could simply not cope with the increase in traffic.

I also object to Policy A44, land West of Winds Ridge & Send Hill, designated for 40 homes & 2 Travellers Pitches. Again, this site is new & was not included in the Regulation 18 draft & has not been consulted upon before. This was previously a land fill site which is currently vented, making the subsoil inappropriate to build upon. It is also within the Green Belt & so protected. The proposed Travellers Pitches are totally inappropriate due to the single width narrow country road access. Both proposals would impact on existing residents, cemetery users & the quiet country road.

I would be most grateful if you could pass my comments on to the Planning Inspector. I am passionate about the beautiful area in which we live & would hate to see it ruined by overdevelopment & the loss of our very valued Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I object to the proposal to inset Send Business Park from the Green Belt because this would give free reign to build expensive new houses here in the future in an area of outstanding natural beauty, adjacent to the beautiful Wey Navigation. Also, as I have already mentioned there is highly restricted vehicular access along Tannery Lane in both directions & any development causing more traffic along this road would be a mistake!

Send represents 11% of the borough, yet 40% of GBC proposed development has been targeted in our area! This is disproportionate & will cause over-development of our village & misery to all that live here. Our roads are already frequently blocked before any more development is made & we stand to loose beautiful areas of countryside. We choose to live in a village & not a town because of its rural setting & care passionately about our environment! Please listen to our objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2575  Respondent: 10812289 / Deborah Clover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in Policy A43 at Garlick's Arch because there is no proven demand for Travelling Showpeople plots at this location. It is beautiful permanent Green Belt containing ancient woodland, some of which has been around since the time of Elizabeth 1st. It is also subject to frequent flooding & is currently a flood zone 2 allocation. There are NO exceptional circumstances to build on it & it's development would defeat the key purpose of the Green Belt & effectively join up Ripley & Send. Together with the 400 proposed new homes on this site, 6 plots for traveling showpeople & their associated large vehicles will generate excessive traffic & will cause total gridlock in our area. It also does not take in to account the inadequate infrastructure of roads, schools & medical facilities, as required by law!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2576  Respondent: 10812289 / Deborah Clover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the changes to Policy A58 at Burnt Common because GBC have changed this from a maximum of 7,000 sq m of industrial space to a MINIMUM of 7,000 sq m of industrial space. There is simply no need to build industrial or warehouse sites in the middle of the Green Belt when Slyfield & Guildford still have empty sites. The 2017 Employment Land Need Assessment actually show a reduction in demand for industrial land to 3.9 hectares, so why has GBC over allocated a minimum of 10 hectares at Send alone? The impact on surrounding roads will cause gridlock & Send & Ripley will be joined up as one. This proposal was deleted from the 2014 draft because of all the objections, not to mention the thousands of objections logged last year. Why is GBC not listening?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am writing to strongly object to more housing for the above village as proposed in the neighbourhood plan.

Horsley is a village not a town and does not have the infrastructure amenities or facilities to cope with more people (school places, doctor appointments, cars on roads etc).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

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Horsley is a village not a town and does not have the infrastructure amenities or facilities to cope with more people (school places, doctor appointments, cars on roads etc).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 45 houses at Clockbarn Nursery because of the inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take and more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 apartments at the Tannery and for building a marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/6459</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13577 | Respondent: 10813345 / Ruth Cope | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic. I request that my comments are shown to the planning Inspector who will decide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13574   Respondent: 10813345 / Ruth Cope   Agent:

I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1598   Respondent: 10813345 / Ruth Cope   Agent:

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic. I request that my comments are shown to the planning Inspector who will decide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposal to inset Send Business Park from the Green Belt because:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I **object** to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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• It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Policy A43 change at Garlick's Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3118</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no "exceptional circumstances" exist
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- It is exquisite ancient woodland that existed at the time of Elizabeth 1
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3008  Respondent: 10813345 / Ruth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3171  Respondent: 10813345 / Ruth Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the 2016 Draft Local Plan

I object to, robbing us of the Green Belt, [text unreadable] aim to build so much, and cover the land in concrete where is the surface water going to go? (obviously on Send Marsh), We will be absolutely flooded. It is all wrong.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/603</th>
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</table>
I object mainly about the building on the land known as A43 Garlicks Arch site area. This area is some fifteen to eighteen feet above Sendmarsh. At this moment the heavy rain is soaking into the fields. When its all concreted the water will obviously run down to Send Marsh and create a flooded area. Approximately 2 to 3 years ago. Over 1 million pounds was spent to avoid a flood, even with the fields taken so much of the water. What will happen when the fields become concrete? Surely we pay our rates and taxes to keep our lively hood safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1280  Respondent: 10815553 / S.G.E. Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that although new schools and doctors and indeed other medical centres will be needed to cope with the proposed additional beings, how will the emergencies cope with the amount of traffic all this building and business will bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1272  Respondent: 10815553 / S.G.E. Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the erosion of the green belt land that has always been our heritage and promised as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1271  Respondent: 10815553 / S.G.E. Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<tr>
<td>I object to the draft 2016 Local Plan in its entirety.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>I object to the fact that only a short amount of time has been allowed to the residents and have not been consulted before these plans have virtually been thrown at us.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object that not only has the main plans been organised quickly then another extra plan has been placed on top of it within 2 weeks.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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**Comment ID:** PSLPP16/1284  **Respondent:** 10815553 / S.G.E. Smith **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that who has estimated the amount of dwellings and other buildings to be added to such a small area there are far larger areas of unused land in the Surrey area without encroaching on the small villages here abouts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/249  **Respondent:** 10815681 / Penelope Corlett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I finally object to the reason why this part of beautiful [text unreadable] with so many nice people living in peaceful villages should suffer because a few people with great minds? And the want of money should [text unreadable] out space (green belt) and properties.

I wish we could hear someone's answers to our objections and make them fit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/249  **Respondent:** 10815681 / Penelope Corlett **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Send - I object to the significant changes from 185 houses in April 2016 to the present 485 which will require a full consultation under Regulation 18, not the short cut of Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/370  Respondent: 10815681 / Penelope Corlett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 I object to the land at Garlick's Arch designated for 400 houses. This site was not in the Regulation 18 draft and has not been consulted upon. The industrial development is not required and should be at Slyfield. The additional traffic resulting from such a development would increase the traffic on Send Road and Ripley which is already gridlocked at certain times of the day as is the A3. Thorough research and consultation would prove this site as impossible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/926  Respondent: 10815681 / Penelope Corlett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find attached photos taken of the floods at Garlick's Arch in November 2012. This is a recognised flood plain which drains down into Send Marsh. Hence the name Marsh. I object to the planning proposals for housing and industrial sites because of the unsuitability of the land and also because of the traffic which would be generated on already congested roads. An added factor would be that future purchasers would not be able to get cover for flood risk.

[IMAGE 1]

[IMAGE 2]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  IMAGE 1.jpg (165 KB)  
 IMAGE 2.jpg (143 KB)
<table>
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<tr>
<th>Comment ID: PSLPS16/372</th>
<th>Respondent: 10815681 / Penelope Corlett</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>5. Policy A43a. I object to the land proposed for slip roads to and from the A3 at Send Marsh/ Burnt Common. This would add to the gridlock on the A3 at peak times which is already a major problem. The approach roads of Send Road and the West Clandon road are already congested and could not cope with any more through traffic at peak times. This would become a major access point to the A3 from Woking and the roads and infrastructure are totally inadequate.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>4. Policy A44. I object to the proposed development on the land west of Winds Ridge and Send Hill. This site is Green Belt and is also unsuitable because the subsoil is unsafe as it is an old land fill site and is currently vented because of noxious gases. It is also unsuitable because of the narrow lane and very dangererous blind corner with the junction of Potters Lane and quite unsuitable for Travellers Pitches with their big lorries and caravans. The additional traffic generated would be impossible on an already narrow road which gets very congested with school traffic and parking.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/790</th>
<th>Respondent: 10815681 / Penelope Corlett</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
1. Policy P2  I object to the 'insetting' of Send and other villages from the Green Belt. The Government advice is clear that housing needs alone is not adequate grounds for building on green belt. The SHMA figures may be inaccurate and need revising after Brexit. Send is a buffer between Woking and Guildford and should remain as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/130  Respondent: 10815681 / Penelope Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

This proposal has increased the number of houses since the April 2016 proposal 300 houses and has added a four way road junction on to the already congested A3 which requires a full consultation under Regulation 18

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/9  Respondent: 10815681 / Penelope Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 Green Belt at paragraph 4.3.15

I object to the proposal to take Send Business Park out of the Green Belt. It is an old site on the banks of the River Way with very limited access via Tannery Lane and further development of this site would present innumerable problems. The land floods and the increased traffic created on this narrow lane which is single track for much of it with few passing places, would prove impossible. Once again this land is Green Belt and should be preserved as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/238  Respondent: 10815681 / Penelope Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane, Send

I object to the fact that the proposed number of homes has been increased from 45 to 60 which is incredible you having had so many previous objections to this site. Tannery lane is a very narrow lane with poor,dangerous, access at either end and quite unsuitable for a large development. The site is on Green Belt Land which is subject to flooding and will the development will impact on the River Wey Navigation. There are already sewage problems in this area as the local plant is unable to cope with excess rain water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/239  Respondent: 10815681 / Penelope Corlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Land at Garlick’s Arch, Send Marsh

I object to the inclusion of 6 Travelling Showpeople plots for which there is no demand. This is a beautiful site of ancient woodland and subject to flooding. Is Green Belt and there are no exceptional circumstances as to why this should be developed. All my previous objections regarding increased traffic still stand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/240  Respondent: 10815681 / Penelope Corlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 Land at Burnt Common, Send.

I object, in that this had previously been deleted from the 2014 Draft owing to the objections raised and there is no demand for industrial land in the middle of Green Belt when there are still empty sites at Slyfield. Once again the traffic generated would cause gridlock on already very congested roads. The 2017 Employment Land Need Assessment show a reduction in demand for the whole borough to 3.9 hectares and to over allocate 10 hectares to Send is entirely disproportionate.

I trust my views will be taken into consideration and await your acknowledgement of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2802  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object wholly to the number of houses proposed for Wisley, Gosden Hill & Blackwell Farm over 5,000. GBC housing requirements are overly exaggerated and not open to inspection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5788  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planned A3 interchange, our village is gridlocked at the best of times without further traffic, noise & pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11753  Respondent: 10816481 / Jeff Waine  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt our woodlands & open spaces our not just for our wellbeing but generations to came

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11752  **Respondent:** 10816481 / Jeff Waine  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I firstly object to the fact that GBC are intent on removing Send village from the Green Belt after election promise to protect Sends Green Belt. Also central government supports keeping the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1636  **Respondent:** 10816481 / Jeff Waine  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems you GBC have a complete disregard for us local residents of Send & Ripley, we rise thousands of objections to building on the Green Belt surrounding our village and you go ahead and change your local plan, so we all have to object again, but this time you increase your greed for land and housing. Therefore I object to the Policy A42 change at Clockbarn in Tannery lane because it is a third more home then the original proposal, Tannery lane itself is very narrow and very prone to flooding, beside the gridlock and pollution you will be causing on the already congested roads, and also impacting on the open countryside to impacts of pollution and building.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1656  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore I object to the Policy A42 change at Clockbarn in Tannery lane because it is a third more home then the original proposal, Tannery lane itself is very narrow and very prone to flooding, beside the gridlock and pollution you will be causing on the already congested roads, and also impacting on the open countryside to impacts of pollution and building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1637  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlicks Arch, Where there are the "exceptional circumstances"?that you need to build on ancient woodland, the area is currently a flood zone, it lays in the green belt , you will be causing congestion for our roads even more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1657  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlicks Arch. Where there are the "exceptional circumstances" that you need to build on ancient woodland, the area is currently a flood zone, it lays in the green belt, you will be causing congestion for our roads even more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1638  Respondent: 10816481 / Jeff Waine  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at burnt Common. It was already deleted from the 2014 draft because of objections. Slyfield still has empty sites and units, you again are willing to put aside the green belt for your own gain damaging the environment and wildlife, when industrial, sites shows a reduction in need. More traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1658  Respondent: 10816481 / Jeff Waine  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at burnt Common. It was already deleted from the 2014 draft because of objections. Slyfield still has empty sites and units, you again are willing to put aside the green belt for your own gain damaging the environment and wildlife, when industrial, sites shows a reduction in need. More traffic gridlock.

Lastly I object to the Green belt policy 2 at paragraph 4.3.15, i.e. to inset Send Business park from the Green Belt, there is restricted access in Tannery lane, both ways and further expansion would harm the outstanding countryside, through pollination and building.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/444  Respondent: 10816481 / Jeff Waine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems you GBC have a complete disregard for us local residents of Send & Ripley, we rise thousands of objections to building on the Green Belt surrounding our village and you go ahead and change your local plan, so we all have to object again, but this time you increase your greed for land and housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4690  Respondent: 10816513 / Annmarie Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in
conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4692  Respondent: 10816513 / Annmarie Shenton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35),
Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4693  Respondent: 10816513 / Annmarie Shenton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3137  Respondent: 10816513 / Annmarie Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/628  Respondent: 10816513 / Annmarie Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3301</th>
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Scale of the Proposed Developments:

The 593 houses in East & West Horsley will further aggravate the already overstretched infrastructure. The road through East Horsley (Ockham Road North & South) is inadequate even now, and cannot be upgraded. Normal cars have to slow down to pass each other in certain parts, and climb onto the pavement when a truck passes through.

And you want to add further traffic to the area?!

I understand that there are plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, only two miles from East Horsley. I am of the opinion that the Horsley area will not be able to absorb the increased population, traffic and pollution in the area.

It is not realistic to assume that the new town will restrict itself to the Wisley Airfield area. Their daily routine will spill into the surrounding areas including East Horsley. We do not have sufficient facilities, schools, surgeries and other services. Gas, electricity and telephone services in the area are already operating at full capacity on very old pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.
The scale of the proposed development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.

Station Parade a “District Centre”?

There is a clear misunderstanding of the nature of the facilities in our village centre, it would be completely inappropriate to target the area for future urban development. Please, get out of your offices and come and see the village in action on any normal week day and week end, see how the facilities, roads, drainage etc are already overstretched. As a certain tennis player often said: You cannot be serious with these proposals!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt:

The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Housing Duncan Sandys encouraged local authorities around the country to consider protecting land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for including land with the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

It appears that you now want to ignore the very reason for having designated Green Belts around urban areas, and specifically around my village of East Horsley. I strongly OBJECT to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of East Horsley I write to OBJECT most strongly to the Proposed Submission Local Plan – Strategy & Sites consultation document, which includes plans to develop a massive 593 new houses in the Horsleys, and a new 2,000+ house village at Ockham (former Wisley Airfield), notwithstanding the enormous amount of concern and objections expressed by local residents in the last couple of years.

Why do we have to, yet again, write to express our objections to all of the proposed developments. This process is clearly designed to wear the local residents down until the plans get implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objection:
I know that I am not the only person writing, yet again, to OBJECT to your development plans. I hope that the GBC, as our elected representatives charged with representing our interests, will LISTEN TO THE COMMUNITY.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of East Horsley I write, **YET AGAIN**, to **OBJECT** most strongly to the Proposed Guildford Local Plan 2017.

The 2016 Local Plan had some serious effects on our village:

- The extension of the settlement boundaries of the Horsleys into the Green Belt
- The removal of the extended village areas from the Green Belt
- The proposal to develop SIX (!) large housing sites and several smaller sites in the extended settlement area

The changes in the Guildford Local Plan 2017 are minimal, FOUR of the original development sites remain, including the proposal for 2,000+ houses, plus sheltered/care homes, Gypsy/Traveller pitches (!!!), employment/retail space and two schools on the former Wisley Airfield.

Wow, is that a town or a city?!!

There were, I understand, over 30,000 objections to the 2016 Local Plan which identified a clear desire to limit expansion into the Green Belt. I see no evidence in the Guildford Local Plan 2017 that this plea has been heeded.

Why do we have to, yet again, write to express our objections the proposed developments? This process is clearly designed to wear the local residents down until the plans get implemented. 30,000 objections last year, but yet again, here we are having to comment on a Local Plan that keeps being thrust down our throats.

**Scale of the Proposed Developments:**

The developments will further aggravate the already overstretched infrastructure of both East and West Horsley. The road through East Horsley (Ockham Road North & South) is inadequate even now, and cannot be upgraded. Normal cars have to slow down just to pass each other in certain parts, and climb onto the pavement when a truck passes through.

And you want to add further traffic to the area?!?

The development plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, is only two miles from East Horsley. I am of the opinion that the Horsley area will not be able to absorb the increased population, traffic and pollution.

It is not realistic to assume that the new town will restrict itself to the Wisley Airfield area. Their daily routine will spill into the surrounding areas including East Horsley. We do not have sufficient facilities, schools, surgeries and other services. Gas, electricity and telephone services in the area are already operating at full capacity on very old pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.

The scale of the proposed Wisley Airfield development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.

**Station Parade a “District Centre”?**
There is a clear misunderstanding of the nature of the facilities in our village centre, it would be completely inappropriate to target the area for future urban development. Please, get out of your offices and come and see the village in action on any normal week day and week end, see how the facilities, roads, drainage etc are already overstretched. As a certain tennis player often said: You cannot be serious with these proposals!

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The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Housing Duncan Sandys encouraged local authorities around the country to consider protecting land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

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How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

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Objection:

I know that I am not the only person writing, yet again, to OBJECT to the Guildford Local Plan 2017. I hope that the GBC, as our elected representatives charged with representing our interests, will LISTEN TO THE COMMUNITY.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1645  Respondent: 10816673 / G Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1653  Respondent:  10816673 / G Hall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand the SHMA FIgures for Guildford B C are to be revised
Following BREXIT
and
Following errors made

I therefore object to the draft Local Plan as the Housing figures are incorrect

If you correct the figures my understanding is that at least 100 dwellings per annum for 20 years would be removed from the figures for Guildford Borough

So that is well in excess of 2000 homes and once that is the case, G B C really does not and should not develop green belt sites

I request that the figures be re visited
I request that G B C do focus now on derelict land, ghastly brown field sites and develop those and leave countryside alone

There is no need to touch the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1644  Respondent:  10816673 / G Hall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am dismayed to hear news of massive proposed house building projects in and around West Horsley and the wider Surrey area. I wish to register my strongest objection to the multiple proposed sites but particularly what's planned to happen around East Lane in Horsley.

These proposed developments will change rural nature of West Horsley Village, and the visual amenity to all of us who currently live here.

It looks to me as though the county has been hijacked by development mad entrepreneurs. I understand there is a local policy to protect the Metropolitan Green Belt against inappropriate development.

I object to removing the Horsleys from the Green Belt. - I can see no exceptional circumstance to justify this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3072  Respondent: 10816673 / G Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am horrified to hear of the massive proposed house building projects in and around West Horsley and the wider Surrey area. I wish to register my strongest objection to the multiple proposed sites but particularly what's planned to happen around East Lane in Horsley.

These proposed developments will change rural nature of West Horsley Village, and the visual amenity to all of us who currently live here.

I understand there is a local policy to protect the Metropolitan Green Belt against inappropriate development.

I object to removing the Horsleys from the Green Belt. - I can see no exceptional circumstance to justify this action.

Our Roads and services infrastructure is already overloaded.

The village suffers from a high water level in the ground and at times waterlogged fields overflow onto the roads. For example East Lane and the Street in West Horsley. If the fields are built on this will compound surface water problems. This is a particular concern as we seem to have more rain in recent years.

The surrounding roads including A3 and M25 often get gridlocked and many drivers including me have given up on them and started using our village roads as a cut-through instead. So adding 100's of new families into the area will add perhaps 1000 extra cars onto local roads.
The Street and East lane have narrow sections and suffer congestion at either end particularly with drop-offs at Glenesk and Cranmore schools.

The increase in traffic will cause longer queues and congestion and increase risks of road safety and accidents to residents on foot and bikes, and the drivers themselves. The local roads are in a terrible state and more traffic will make things worse.

The increase in population will overload already stretched resources such as a doctors surgery already stretched to the limit and shops and parking. The planned population increase (in excess of Government ONS forecasts) for the Borough will require a major extension of the Royal Surrey Hospital to cope.

The state schools eg Raleigh and Howard of Effingham are overloaded already, so as far I can see there is no planning if infrastructure roads, resources and amenities to support the development.

These proposed developments each change the local area where they are planned They are over-bearing, out-of-scale or out of character in terms of its appearance compared with existing development in the vicinity.

I am also concerned that taken together these developments have an adverse effect on Nature conservation in the area.

West Horsley Parish is one of a rich and varied mix of well established low housing density settlements with a considerable number of historic buildings. There are a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.

Overdevelopment: Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The Site Allocations list totals 12,698.

Village expansion is unsustainable. With only one small shop, no post office, a very limited weekdays only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.

The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village.

Traffic generation from the proposed new housing estates will be considerable. Most households in rural areas as a necessity have 2 cars, many having 3. Journey times on local roads will increase significantly.

There are known sewage overflow problems in the Ockham Road North / Green Lane area. Thames Water has advised Guildford Borough that the area’s waste-water network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley, will need to be upgraded to cope. Thames Water advise ‘a 2 to 3 years lead-in period’ to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

I appeal to Guildford Borough Council to wake up to their responsibilities to protect their residents and the environment, from this massive reckless plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The surrounding roads including A3 and M25 often get gridlocked and many drivers including me have given up on them and started using our village roads as a cut-through instead. So adding 100's of new families into the area will add perhaps 1000 extra cars onto local roads.

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The increase in population will overload already stretched resources such as a doctors surgery already stretched to the limit and shops and parking. The planned population increase (in excess of Government ONS forecasts) for the Borough will require a major extension of the Royal Surrey Hospital to cope.

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The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/580</th>
<th>Respondent: 10816705 / Maggie Cole</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements for the Plan. There is no schedule for Garlick’s Arch so the Plan takes no account of the infrastructure required for this site.

Furthermore the development at Garlick’s Arch would result in the loss of four successful existing rural businesses, which have been for there many years employing local people and are therefore clearly sustainable.

12. I object due to the congestion that development will cause to the trunk roads, A3/M25

The A3 and M25 would need to be improved before any development can be considered. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no enhancements are possible in the timeframe of this Plan so the developments at Wisley Airfield, Garlick’s Arch and Gosden Hill should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/805  Respondent: 10816705 / Maggie Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

Garlick’s Arch is within the Green Belt. There are no exceptional circumstances which allow for its removal. Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land. Why have GBC removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch?

Garlick’s Arch is not appropriate because:

- There is no transport infrastructure
- There are no plans to improve local schools, medical or utilities to cope with the increased needs these new homes
- The site is liable to flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/806  Respondent: 10816705 / Maggie Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch

There is no need for new industrial sites at Garlick’s Arch. There is an existing brownfield industrial site at Burnt Common that could easily house the 7,000 sq m proposed. Why was this site was removed from the Plan without any reason?

I object to the lack of proper infrastructure planning for sites

The Plan does not identify adequate infrastructure improvements to support the scale of development, especially at Garlick’s Arch which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors, hospitals etc. are already at capacity. It is already extremely difficult to get a GP appointment in the local surgeries without a long wait.

Are there plans to improve the capability of the emergency services, police, ambulance, fire brigade to cover the extra houses in the north east of the borough?

I wish my objections to be taken into consideration and that the Plan is amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/804  Respondent: 10816705 / Maggie Cole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

Ramps to the A3 at Burnt Common would be a disaster for the local population, who do need to access the A3 to the north, but the addition of ramps will draw in a huge amount of ‘through’ traffic e.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as these roads cannot be improved. The queues during the rush hours are such that it already brings gridlock to the local area. Encouraging more traffic to use these roads would be untenable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1657  Respondent: 10816705 / Maggie Cole  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development

The Garlick’s Arch proposal would double the built-up area in the locality, and would irrevocably damage the trees on the site, which includes over 80 ancient Oaks. Once these historic environments are destroyed they cannot be replaced and should be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1654  Respondent: 10816705 / Maggie Cole  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plans for improvements. You cannot squeeze modern traffic down lanes that were built for a horse and cart.

The rural roads in this area are narrow, in poor condition and have no pedestrian footpaths. The new homes will generate dangerous and unsustainable traffic. The historic village of Ripley was given a by-pass to save it for future generations not make its roads into a car park.

Every time there is a problem on the A3/M25 traffic already congests the area to dangerous levels. With the increasing cycle traffic on the Olympic cycle route to the Surrey Hills using the same narrow lanes, this is a recipe for a human disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1659  Respondent: 10816705 / Maggie Cole  Agent:
9. I object to poor air/noise quality concerns

The developments being proposed, particularly in the north east of the borough, will lead to increased congestion and to greater levels of air/noise pollution, which will have a detrimental effect on local residents and their health and wellbeing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1653</th>
<th>Respondent: 10816705 / Maggie Cole</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to not protecting the Green Belt

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield and Garlick’s Arch and the subsequent urban sprawl. The whole beauty and character of the area are the individual villages. There are no exceptional circumstances for these villages being removed, as required by the National Planning Policy.

There is a suitable brownfield site at Burnt Common that should be developed rather than developing Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/1655</th>
<th>Respondent: 10816705 / Maggie Cole</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I object to development in areas which are at risk of flooding

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch is classified by the Environment Agency as being in a greater risk than the Council’s own assessment. I have witnessed flooding many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1652   Respondent: 10816705 / Maggie Cole   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). My objections are as follows:

1. I object to the Local Plan as the proposed developments are not sustainable

The proposed 13,850+ new homes in this tiny area are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. There is no public transport to speak of, only the occasional bus service which has already been cut back. Wisley Airfield and Garlick’s Arch have no railway stations, so almost every adult will have to drive their own car. It is already difficult to cross main roads as a pedestrian; more traffic will make it impossible and extremely dangerous.

The development should be in more urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1656   Respondent: 10816705 / Maggie Cole   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. I object to the Borough Wide Strategy

There is too much development in the north east of the borough (Wisley, Ripley/Send and Clandon). Why is 36% of the entire Plan’s new housing proposed in this tiny area? Why are other areas not being proposed?

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation with the loss of village identities. I was always under the impression it was Council policy to keep each village separate and retain their individuality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/136  Respondent: 10816705 / Maggie Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Increasing the size of Site A35 – Former Wisely airfield. The sheer volume of traffic using our High Street and local single track lanes will cause further intolerable congestion and pollution. More and more cyclist use these routes and increasing traffic will create accident black spots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/135  Respondent: 10816705 / Maggie Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. There are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network. Every day there are jams and problems on the local roads and this is only going to intensify with more and heavier traffic. More houses means yet more pressure on already stretched local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/131  **Respondent:** 10816705 / Maggie Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. The development at Site A43 Garlicks Arch would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation.
2. The potential of an increase from a minimum 400 houses up to a possible 650 at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause merger of these villages. Villages should remain individual and not be merged into one huge conurbation. Local facilities, doctors, schools etc. cannot cope with this increase. Have you tried getting an appointment with a GP recently.
3. Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
4. Including six Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural area within the Green Belt and there is no identified need within the Local Plan. The allocation of six Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and therefore is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/132  **Respondent:** 10816705 / Maggie Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

5. The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt. What has Ripley/Send done to deserve this unfair distribution?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/134  **Respondent:** 10816705 / Maggie Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. The potential for a substantial increase in industrial floor space from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with sufficient information for a full and proper consultation given the ambiguity and lack of detail within the document. Also the increase in heavy traffic is unmanageable within the local roads and lane

7. The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.4.23a and does not allow for full and proper consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4210  Respondent: 10816865 / William Adrian Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sites planned for development, approx 533 homes, put increasing pressure upon a stressed infrastructure. The villages in the area cannot cope with the infrastructure at present, never mind increased numbers of children in our schools, increased traffic on our picturesque country lanes, increased medical needs etc, the list is endless. This is a sure sign of the first step toward urbanisation, the people that live in the area are here to get away from that.

To even consider sites within this historic and scenic Surrey countryside is a travesty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4209  Respondent: 10816865 / William Adrian Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Being an East Horsley resident, it is with deep concern that I submit my objection to the proposed local plans for the Horsleys.

The development of 533 would be totally against Guildford Borough Council's definition of a conservation area; the plans to remove the Horsleys' green belt would be both damaging to the character and ecology of the villages.

A printed statement, in 2014, by Guildford Borough Council regarding its planning policy states: "We interpret national and regional planning policy and prepare the Guildford Local Development Framework to guide development in the borough. This framework covers a wide range of issues including development in Guildford town centre and elsewhere in the borough, new homes, PROTECTING THE NATURAL AND HISTORIC ENVIRONMENT INCLUDING GREEN BELT".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3201  Respondent: 10816897 / P G Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My first objection concerns road traffic. The Ockham Road is already used as a rat run between the A246 and the A3/M25. Additional construction traffic will initially exacerbate the poor road surface conditions. Even a conservative estimate of 1 car per new house in the 533 new houses will worsen traffic at peak times (school and station runs.) Already in the last few months a lorry has damaged the railway bridge at Horsley station and the have been two serious accidents on Ockham Road South in the past 7 days. Repeated requests for height, weight and speed restrictions have been ignored. Parts of this road are not wide enough for two cars, let alone HGVs or fast moving emergency vehicles.

Furthermore, traffic control measures will be needed at Thatchers Hotel site. The bend on the A246 is sharp and semi-blind and traffic joining this road from Ockham Road South already faces lengthy peak-hour delays. The Thatchers Hotel and Bell and Colvill developments will only make matters worse.

Traffic onto the Ockham Road North and the A3 from the Wisley site will also need control. The Ockham Road South at the Ripley junction is prone to flooding.

The second issue is Infrastructure and services. Medical facilities in East Horsley are already overstretched. Schools are full. Parking is limited, especially at the station.

Finally the removal of green belt restrictions and the development of the Wisley site will change the village environment beyond repair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4115  Respondent: 10816897 / P G Williams  Agent:
While I welcome the removal of housing sites at the Ramada Hotel and the fields south of East Lane, the remaining proposals are still unacceptable. The construction of a new village on the Wisley site would mean overloading of local roads especially Ockham Road South. If the plan is executed, the local transport system, roads, rail and buses would require a significant increase in capacity, whereas at present local services are being cut back. Furthermore the remodelling of the M25 interchange at Wisley would add to local disruption.

At present local GP surgeries are struggling to cope. The increased population from the plan would only increase the pressure.

Does the plan also allow for an increase in police and fire service personnel required for this population?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/2936</th>
<th>Respondent:</th>
<th>10816993 / Jane Roberts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever
since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6010  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higgeots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see above and below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. To allow this would be plain irresponsible.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 10816993 / Jane Roberts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infant school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E1 - Further development in areas of Green Belt

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12204  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12208  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12272  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12249  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or no force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12240  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12220  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. This will increase the risk of serious accidents.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon where I live, already suffer from intolerable traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based
on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network, phone and broadband and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital; where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12225  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. This is clearly a huge flaw in the plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12233  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12191  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12186  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1440  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1444  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1448  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Policies

General Comment

GBC’s proposed Local Plan proposes:
533 houses on large sites in East and West Horsley (The Horsleys)
60 houses on small sites in The Horsleys
2000 houses on Wisley Airfield
400 houses on Burnt Common
2000 houses at Gosden Hill Farm (on the A3 near Burpham)

This makes a total of 4,993 houses within a 5-mile radius of The Horsleys, not including many smaller sites in nearby villages.

At the moment there are 2808 houses in The Horsleys (EH 1697, WH 1111).

Thus I calculate that the plan represents:

• A 21% increase in housing stock within The Horsleys.
• A 178% increase in housing stock within a 5-mile radius of The Horsleys.

I can find no argument in the document ‘Guildford Borough Economic Strategy 2013-2031 for locating such large numbers of homes in The Horsleys or neighbouring villages. Rather the majority of the Strategic Employment Sites proposed in Policy E1 are over 5 miles away from them.

There are serious shortcomings with, and deficiencies in the infrastructure, of The Horsleys currently as I have stated above under Policies I1, I2 and I3. The housing growth for The Horsleys set out by GBC in the Proposed Local Plan will merely exacerbate this problem.

In addition these policies run contrary to NPPF paragraph 17 which specifically states that planning should be about “empowering local people to shape their surroundings”. As I have said earlier, but it bears repeating, comments on local social media sites and discussions with inhabitants of East Horsley lead me to conclude that Site Policies A35-A41 do not shape the surroundings in the way local people would wish. There seems little doubt that the local populace feel victimised by GBC’s policies when The Horsleys will be required to build, in percentage terms, twice the amount of housing than Guildford urban area.

I OBJECT therefore to Site Policies A35-A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICIES A37, A38, A40 & A41, located in West Horsley

These policies propose a total of 405 dwellings from these six sites. The 2011 Census showed West Horsley had 1,124 dwellings at that time. This represents an increase of 36% over the plan period, a very high proportion by any standards.

These four sites all currently lie within the Green Belt. Development on them requires settlement boundary movements. As I have stated in the objection to Policy A39 above, the NPPF is quite clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. I do not believe these policies demonstrate any such circumstances and are therefore unjustified and contrary to NPPF rules. If this boundary movements are invalid then these sites remains a part of the Metropolitan Green Belt. Therefore the housing development proposal would be invalid.

I OBJECT to Policies A37, A38, A40 and A41 as they do not demonstrate the exceptional circumstances required to move the settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2778  Respondent: 10817121 / Roger Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35: Land at former Wisley airfield, Ockham

I OBJECT to this policy for the following reasons:

• The proposed development site

I believe the development site to be set entirely within the Metropolitan Greenbelt as opposed to the statement on the Wisley Airfield website (http://wisleyairfield.com/) which calls it the “the biggest brownfield site in the Guildford area”. Removal of this site from the Green belt is totally against NPPF rules, regulations and its underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

I can see no demonstration of any of the exceptional circumstances necessary to alter greenbelt boundaries. Thus the proposal is inappropriate development in the Green Belt as defined by NPPF paras 88 and 89.

I also believe that:

• The vast majority of the site (70.1 ha) is Grade 3 quality agricultural land. This arable land has been farmed for many years and, I understand, produces over a million loaves of bread a year,

• Currently the site is crossed by a number of Public Rights of Way, both footpaths and bridleways, which are used by local residents.

NPPF para 79 states:
“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

I believe the above bullet points show the proposed development is to be at odds with this.

Therefore I OBJECT to Policy A35 as a breach of the Metropolitan Green Belt rules.

- **Levels of sustainability**

One of the core concepts of planning policy is sustainability. However this site is rated very poorly in terms of its sustainability according to a sustainability appraisal undertaken by GBC’s consultant, AECOM. This is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016.

I understand that in their report AECOM rated Site A35 as the very worst of all of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), in terms of its sustainability. No less than 8 out of the 21 criteria were graded as ‘Red’ by AECOM for this site, more than any other large site.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

- **Impact on local traffic and infrastructure**

The proposed development will have a severe adverse impact on road traffic in the surrounding area including my own village of East Horsley. This will be as a result of the high volume of additional traffic which is likely from the residents of Wisley Airfield accessing East Horsley’s two stations, shops, nearby schools and medical facilities.

I estimate that with 2000 dwellings the additional volume of traffic will be in the order of 3,000 cars. This is a considerable increase but there is no detail I could find on the Wisley Airfield website re improving local roads save for the rather bland statement:

> “We’re also making improvements to local roads to reduce rat running, improve traffic flow and increase safety.

_The proposals also see improvements to local footpaths and bridleways._”

The rural roads in this area are characteristically narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches. Further the main through-roads of Ockham Road North, Ockham Road South and Forest Road pass along poorly lit residential areas so narrow that large vehicles such as buses cannot pass each other in certain sections of these ‘lanes’. Indeed each of these roads has pinch points where one can only just fit two cars abreast, let alone two large vehicles

There are many schoolchildren who both cycle and walk along these through roads on their way to local schools. Ockham Road North has only a narrow footpath through East Horsley village and Forest Road has no footpath in places. The additional traffic will therefore increase the likelihood of accidents and reduce the safety of their journeys.

The road closures and junction changes which I have seen mentioned previously accompanying this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak times. Also any resultant increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority. I understand Highways England have repeatedly expressed serious concerns about this development.

The Wisley Airfield website states that there are 9 mainline stations within 5 miles. The reality, I suggest, will be that the vast majority of inhabitants of this development would in fact travel from Effingham Junction or Horsley stations. Why? Because they are the nearest stations, much quicker to reach than the others, especially at peak times, and it is cheaper and quicker, in terms of overall journey time, to travel from these to London or Guildford (which is where most people would be going) than from elsewhere.
Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity, something I know from personal experience! The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel to and from these stations lacks credibility.

Also proposals include plans for buses to run through the site to major local destinations approximately every 10 minutes at peak times. I wonder what these peak times would be. Many commuters to London start early and/or finish late. There is no local taxi service at Effingham Junction station so once again no doubt a car would be used– further increasing traffic volumes.

Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure

• **Health and Safety Concerns**

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country with traffic frequently at a standstill during peak hours. This must affect the air quality in the locality. I have seen figures from the Wisley Action Group website in the past showing the Nitrous Oxide (‘NOx’) levels being above the EU limit of 40 mg/m3. This will doubtless affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In addition, I believe residents of the proposed development will rely on cars as their main mode of transport. I estimate this means around an extra 3,000 cars. This will increase the problem of poor air quality.

NPPF para 109 says:

“The planning system should contribute to and enhance the natural and local environment by” ..... 

“... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”.

I believe that the points I have made above demonstrate that the proposed development runs contrary to the above NPPF paragraph.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications

• **Local Character**

The development is inappropriate in size and type with regard to the surrounding villages. In the 2016 proposed Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

The area is essentially rural with many charming picturesque rural villages, such as Ockham, East and West Horsley and Ripley, containing historic, listed or protected buildings. However the proposed development is large in comparison to the local villages. It would create a community of just over 2000 homes. This is much larger than the nearest village, Ockham, which has less than 200 dwellings, and would represent an increase of around ten times the existing housing stock. It would effectively be not far short of the combined housing stock of East and West Horsley.

With respect to Ockham, would this mean the disappearance of a small historic rural village?

Ockham is documented as being in existence as far back as the 11th Century when it was mentioned in the Domesday Book of 1086 as Bocheham. It has a number of historic buildings including All Saints, a Grade 1 listed building which has a nave which is partly 12th century, as are its foundations and other parts dating from the 13th and 15th centuries. Others include Ockham Park, a 17th century country house at one time home of Ada Lovelace the famous mathematician whose work on early computers with Charles Babbage is renowned world-wide, Ockham Mill dating from the Victorian Era and The
Hautbouy built in typical brick and flint Lovelace style. In addition it is the birthplace of William of Ockham, the famous medieval philosopher and inventor of the theory of Occam’s Razor.

The proposed development seems to effectively ‘absorb’ the medieval hamlet of Ockham. I believe that this would cause Ockham to lose its identity and doubtless, in the fullness of time, be forgotten. What a tragedy that a village so rich in our history should be treated thus. This should not be allowed to happen.

The overall housing density of the Wisley Airfield settlement area I have seen calculated at around 49 dwellings per hectare (‘dph’). I understand that this density is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense. Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley.

I believe the character of this whole area would be irreparably destroyed if this proposed development were to go ahead. The development therefore fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

Thus, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

- **Historic environment**

This is covered in some detail in Policy D3 of the GBC proposed plan. In particular it says:

“Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.”

The Horsleys, Ockham and Ripley all contain a wide range of heritage assets which make an important contribution to the look and feel of the villages, their character and the environment surrounding them. I have given an example for Ockham village under Local Character above. However it is true also of the other villages I mention.

Thus, I OBJECT to Policy A35 on the grounds that it fails to meet the criteria set out in Policy D3, Historic Environment.

- **Environmental Objections**

The site is immediately adjacent to the Site of Special Scientific Interest (SSSI) at Ockham and Wisley Commons. Much of the development site is within 400m of the Thames Basin Heath Special Protection Area (SPA). Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”.

The remainder of the site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new Site of Alternative Natural Greenspace (‘SANG’) to mitigate for potential damage caused to the SPA from new development. I cannot understand how any proposal for a SANG can possibly mitigate the potential damage caused to the natural habitats of the bats, ground nesting birds, invertebrates, reptiles and flora and fauna by these additional residents and their pets. Furthermore I am concerned about the impact of the development’s residents, whom I estimate them to number in excess of 5,000, on the Thames Basin Heaths SPA, even with the 400m exclusion zone in place.

It is, I believe, generally acknowledged that “concreting over the countryside” increases the likelihood of flooding as rainwater can no longer drain away naturally into the earth. Indeed there was an article in The Mail Online dated 26th March 2015 stating that 19 scientists, from prestigious universities and institutes in Britain, the US, Japan, Australia and across Europe, claim over-development is making flooding much worse.
Given the size of the planned development this alone should give cause for concern. However there is a further point which adds to this concern. The development is very close to, and slopes down towards, Ockham Road North (ORN) where it is prone to flooding, close to where it meets the A3 roundabout. Local residents I am sure still remember the floods during the winter of 2013/2014 when ORN was impassable for a lengthy period.

In addition, development of this scale would, in my opinion, increase light and noise pollution in its vicinity. This would affect both current local residents and existing wildlife.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse environmental impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY A36: Hotel, Guildford Road**

The subject of this policy, The Thatcher’s Hotel, is an iconic landmark; a long-standing Tudor style village hotel set at the eastern entrance to East Horsley village.

Policy D3: Historic Environment of the draft plan states that

“*Guildford borough’s historic environment is intrinsically part of what makes Guildford the place it is, that it acknowledges the wider social, cultural, economic and environmental benefits that conservation can bring to our community and that it will conserve and enhance the historic environment in a manner appropriate to its significance.*”

It further states that:

“*Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.*”

I OBJECT to this policy as I believe that The Thatcher Hotel is part of this historic environment and that this policy runs contrary to Policy D3.

Furthermore Policy E6: The leisure and visitor experience. States:

“The loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities, hotels and indoor sports venues, will be strongly resisted unless replacement facilities of an equivalent or better standard and provision are proposed in a location equally accessible to the facility’s current catchment area.”

I believe that The Thatcher Hotel is such an existing visitor attraction. Not only does it cater for visitors by providing accommodation and restaurant facilities but attracts visitors by virtue of providing rooms for receptions, parties and so forth.
Therefore I OBJECT to this policy as it runs contrary to Policy E6.

My final concern is over the number of houses proposed for this site - approximately 48. This number gives a gross housing density of 37 dph. The average dph in East Horsley is 8.1 dph. According to the local parish council the highest density found in any of the roads around this location is 13 dwellings per hectare.

The proposed dph is therefore approximately 9 times the average in the village, which makes it exceptionally high for this location.

Thus, I OBJECT to Policy A36 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2780  Respondent: 10817121 / Roger Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A39: Land behind Ockham Road North, near Horsley railway station

My objection follows on from my comments above in the section “Policy P2: Green Belt, b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley”.

Policy A39 proposes a housing development of 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. This is dependent upon the proposed western movement of the settlement boundary needed to bring this site within the settlement area.

The NPPF is quite clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. I do not believe this policy demonstrates any such circumstances and is therefore unjustified and contrary to NPPF rules. If this boundary movement is invalid then this site remains a part of the Metropolitan Green Belt. Therefore the housing development proposal would be invalid.

I OBJECT to Policy A39 as it fails to demonstrate the exceptional circumstances required to move the settlement boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6114  Respondent: 10817121 / Roger Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies I1, I2 and I3

There are serious deficiencies and shortcomings in the infrastructure of East and West Horsley as it is today. Barely a day goes past without a complaint being made on social media about it – be it schools, roads, medical facilities and so on, The aggressive housing policy as proposed by GBC in the proposed Local Plan (see my comments on Policy S1 above) can only exacerbate this problem.

I would make the following comments specifically about infrastructure in The Horsleys today:

- Roads across the parishes are in poor condition with many potholes.
- The principal through roads are narrow and winding and have a series of pinch points where it is difficult for vehicles to pass one another. As a senior SCC councillor remarked at a recent public meeting in the village hall: "East Horsley has lanes, not roads."
- These ‘lanes’ are totally unsuitable for high volumes of traffic. They struggle to cope with current levels of traffic at times, particularly the increasing numbers of large vehicles such as HGVs using them.
- They are used by schoolchildren to walk or cycle to school. Increases in traffic volumes without improvements in infrastructure must increase the risk of accidents to them.
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are also sections with no or narrow pavements and which are poorly lit.
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains.
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

In respect of East Horsley, I believe there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. The proposal is unclear to me. It says that funding will, at least in part, come from developer contribution. Funding is needed now to sort out the existing problems I have mentioned previously - not from some unspecified source at an unspecified future date.

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan. As stated above it is already at capacity and, with an ageing population, this problem will not decrease. Such expansion is therefore needed now!

Local primary schooling is also a very pressing issue which I know East Horsley Parish Council has raised with you in its objections. East and West Horsley are currently served by a single primary school - The Raleigh in West Horsley – which has no spare capacity as far as I am aware. The 11 housing development sites identified in the LAA for East and West Horsley would result in 593 new houses in the two parishes. Planning guidance suggest that to accommodate the children from these new homes around 150 additional primary school places will be required. No proposals are made in the Proposed Submission Local Plan to provide for any more schooling in The Horsleys.

The proposed developments in The Horsleys and Wisley will put further strain on the existing infrastructure, increasing traffic, patient numbers, requirement for school places and so forth. Thus existing problems will be exacerbated. There are no proposals to solve these or at least to improve the situation.

I OBJECT to the infrastructure proposals as I believe that the failure to address the current inadequacies of the existing infrastructure is a serious shortcoming in the Proposed Submission Local Plan.
Also I OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments set out in the Site Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6113   Respondent: 10817121 / Roger Adams   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P2: Green Belt**

I OBJECT to this policy.

Local Plan Policy P2 states that GBC “will continue to protect the Metropolitan Green Belt”.

NPPF rules permit authorities to make allowance for factors which may constrain the delivery of new housing. This would include protecting the Metropolitan Green Belt and the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’). Although these areas make up a large proportion of the land area of Guildford Borough, I cannot find GBC’s attempt to reduce its housing target in order to take account of such constraints stated anywhere.

Thus, GBC appears to ignore its own Policy P2 through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix seems to show that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is surely at odds with its stated policy of protection of the Green Belt.

Furthermore, I believe that GBC has incorrectly interpreted para 83 to 87 of NPPF. Para 83 clearly states green belt boundaries should be altered only "in exceptional circumstances". Ministerial Guidance on the Green Belt (reference Brandon Lewis MP and Nick Bowls MP 17/1/14 and 18/6/14 respectively) show unmet housing need alone is not likely to qualify as exceptional circumstances.

In addition, Sir Eric Pickles when Secretary of State for Communities and Local Government drew attention to the NPPF which states that the Green Belt may be altered ‘…only in exceptional circumstances…’. Sir Paul Beresford, MP for Mole Valley constituency, also commented that “we see in the NPPF that Green Belt protection is specifically cited as a consideration which would override the need to meet housing targets. This is a clear statement of government policy.”

Thus I OBJECT to this policy as I believe that this policy is inconsistent with itself and runs counter to the NPPF guidelines.

I would also like to add a quote from the Campaign to Protect Rural England (CPRE) which says (my underlining):

“Altogether the new plan proposes to build some 7,000 houses on land that is currently Green Belt. This includes a so-called ‘urban extension’ at Blackwell Farm on the Hogs Back (pictured) and two thousand houses at Wisley – this despite the Council’s own planning officers recommending refusal of permission for development at Wisley. The proposed loss of such a huge area of Green Belt in the borough is completely unjustified, especially when local opinion is so strongly against giving up any Green Belt land for development. It appears that the Council is treating both the countryside and the local community with contempt.”
I think the strength of feeling by local people can be gauged from the thousands of letters sent protesting about the previous draft plan and the various past and ongoing campaigns being waged by locals against these GBC initiatives.

In addition I OBJECT to the following paragraphs within this policy.

**a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

East Horsley is a rural village. Its Green Belt status has been a key factor in preserving its character. Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today.

Its current status, i.e. ‘washed over’ by the Green Belt, has not been a serious constraint to development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes in paragraph 4.3.12 the need to inset East Horsley to NPPF requirements as follows:

> “the national planning policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. “.

Anyone bothering to walk around East Horsley would recognise that it does so.

If I may quote some figures from our local parish council; “No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.”

I have already commented above on what I believe to be GBC’s misinterpretation of the NPPF. In addition NPPF paragraph 17 specifically states as part of its 12 principles that planning should be about “empowering local people to shape their surroundings”. Comments on local social media sites and discussions with inhabitants of East Horsley lead me to conclude that this policy does not shape the surroundings in the way local people would wish. This argument is augmented by the number of responses received by GBC regarding the former iteration of the draft local plan. I believe this was around 20,000 most of which were opposed to it.

I can see no facts or arguments within P2 to support GBC’s argument to inset East Horsley from the Green Belt. Nor do I believe it meets NPPF para 17.

I OBJECT therefore to this policy.

**b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC proposes to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’.

GBC states in this paragraph that such “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development”. GBC justifies the need to make such changes in settlement boundaries in order to meet unfulfilled housing need in the borough in the Green Belt & Countryside Study and its accompanying Topic Paper.

However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would disappear.

Therefore I OBJECT therefore to this policy.
c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt and to the planned development of in excess of 2000 dwelling thereon. The only justification for this proposed change appears to be unfulfilled housing need which is not considered an exceptional circumstance.

This proposal runs counter to the wishes of local people and also to the Council’s own planning officers’ recommendation. Indeed GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that:

*It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Furthermore this development would be little short of catastrophic for the local villages, including East and West Horsley, Ripley and Ockham.

I have commented further on this matter under Site A35 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Conclusion

Policy P2 of the GBC Draft Local Plan states that “We will continue to protect the Metropolitan Green Belt.”

It seems to me that in West and East Horsley and surrounding villages the GBC draft Local Plan is doing exactly the opposite. Given the scale of the developments proposed, the effect on the infrastructure (with its current deficiencies and shortcomings) and lack of specified commitment to improve matters the villages will suffer very badly from the increased volumes of inhabitants and traffic to the extent that their existing village character will be lost.

And that of course runs contrary to Policy D1: Making Better Places when considered in its widest context, which is my final objection.

I would appreciate confirmation of the receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Having carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation my comments are set out in this below in this email.

**Policy S2: Borough Wide Strategy**

I OBJECT to this policy as I believe the figures used to calculate GBC’s annual housing target are incorrect.

The policy is based upon a projected net increase of 25% in the housing stock of Guildford Borough over the period 2013-2033. This is equivalent to adding 693 new homes per annum or 13,860 new homes over the period of the proposed Local Plan.

The ONS on the other hand projects a 15% increase in population over the same period.

In addition the West Surrey Strategic Housing Market Assessment, ("SHMA"), which looks at how the annual housing target of 693 homes is comprised, estimates that 517 homes per annum arise from ‘the demographic starting point’. This is effectively what the Office of National Statistics (ONS) and the Department of Communities and Local Government ("DCLG") are predicting GBC will require based upon their population and household forecasts. It would appear from the SHMA that there is some “double counting”. For example, the SHMA has added another:

- 120 homes per annum in order to ‘support economic growth’
- 31 homes per annum to ‘improve affordability’ and
- 25 homes per annum due to ‘student growth’

This increases the original per annum figure of 517 new homes by 176 to reach the 693 annual housing target.

I find this strange as:

- Surely economic growth is already factored into the statistics produced by ONS and DCLG.
- The GBC Affordable Housing Policy H2 proposes that all development sites (other than the very smallest) must have 40% of their homes offered as affordable housing. Thus these would already be included in the 517 homes proposed.

It appears therefore that what GBC is proposing is actually above the official household growth forecasts for the borough.

In addition, the decision of the UK to leave the EU has seen the government and Bank of England forecast that economic growth will be reduced. This further brings into question the number of homes added to the ONS/DCLG figures.

The National Planning Policy Framework (NPPF), paragraph 158, requires GBC to base its development plan policies on up-to-date and relevant evidence. I believe it can be seen from the above that this is not the case.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above policy because of the increase in the number of houses intended for this site. Rather than listen to the hundreds of objections put to you last year that the number was too many, you have chosen to increase the number to 60. This shows you are really not listening. Increased traffic at the crossroads with the A247, particularly at busy times when children are walking alone or being walked to and from the local schools will make for a dangerous situation. Parking is already busy round that junction and additional traffic will create a gratuitous situation for accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3413  Respondent: 10817601 / Gerald Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to plans in the above policy because again you have not listened to the hundreds of objections put to you last year, and you have increased the number of houses and included six sites for travelling showpeople. You have shown no evidence of the need for these sites on a beautiful Green Belt location and where you are required to show exceptional circumstances. This is gross overdevelopment of our village with an excessive number of homes for a village. There is beautiful ancient woodland at the site which has been there since the time of Elizabeth 1 and will join up Ripley and Send thereby defeating the purpose of the Green Belt. An additional 400 houses will cripple the roads around Ripley and Send and contaminate surrounding homes with noxious fumes from congested traffic. I am informed that there is lead shot accumulated over 50 years at the site which, as a parent, I would not want my children to live with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3414  Respondent: 10817601 / Gerald Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the above policy for the following reasons:

It was deleted from the 2014 draft because of all the objections but now you have chosen not only to reintroduce it but to change the stated maximum square footage to minimum: another example showing you neither listen nor care about local objection. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have vacant sites and industrial units, particularly in view of the fact that there is a decreasing demand for industrial land.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt. Heavy traffic associated with industrial development will again contaminate yet further the already bad air from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal to inset Send Business Park from the Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside, adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion of development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the building of 45 houses at Clockbarn Nursery due to the very poor vehicular access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/2706 | Respondent: 10817633 / M Mansbridge | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |

I OBJECT to the building of 45 houses at Clockbarn Nursery due to the very poor vehicular access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7563 | Respondent: 10817633 / M Mansbridge | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

1. I OBJECT to the building of 400 houses and 7000 sq. mtrs. of industrial space at Garlick's Arch due to the destruction of ancient woodland and flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the building of 400 houses and 7000 sq. mtrs. of industrial space at Garlick's Arch due to the destruction of ancient woodland and flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2708  Respondent: 10817633 / M Mansbridge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed new interchange with the A3 at Burnt Common because of the total traffic gridlock through Send which will definitely result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7566  Respondent: 10817633 / M Mansbridge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed new interchange with the A3 at Burnt Common because of the total traffic gridlock through Send which will definitely result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2707  Respondent: 10817633 / M Mansbridge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 40 houses and 2 traveller's pitches at Send Hill because of the very narrow road and the site contamination with unsafe landfill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances to justify this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances to justify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3190  Respondent: 10817633 / M Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY A42, CLOCKBARN TANNERY LANE: because it will illegally erode the Green Belt in Send Village, cause more flooding due to the greater number of houses proposed and worsen traffic problems and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3192  Respondent: 10817633 / M Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY A58, BURNT COMMON: because there is no need for excessive amounts of industrial and warehouse development in the middle of the Green Belt - see the 2017 Employment Land Need Assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1482  Respondent: 10817633 / M Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY 2 paragraph 4.3.15 to inset Send Business Park from the Green Belt: because Tannery Lane is totally unsuitable for a large increase in traffic being a single track road and the area is an outstanding countryside amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/91  Respondent: 10817697 / J E Kettle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing in East Horsley- GBC has proposed new settlement boundaries for East Horsley as well as a new "Identified boundary of the village", and provide no justification for these changes. Furthermore GBC proposes to build 100 houses on Ockham Road North which is in Green Belt, with no justification for this proposal.

I object to the proposed Housing plan for Ockham Road North

The proposed submission by GBC is undemocratic, unjustified, and lacks any credibility as a Plan for the future of the Borough.

I object most strongly to the GBC local Plan Submission

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/125  Respondent: 10817697 / J E Kettle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Despite the issues raised in 2016 little of any significance appears to have changed, which leads me to believe that you do not accept any of the objections to the Local Plan.

Housing Growth- GBC has again shown population growth which is questionable, suspect, and unsupported by relevant figures.

I object to the housing growth projections and Housing targets

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5299  Respondent: 10817761 / Stewart Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I firmly reject the Local Plan, detailed above for the following reasons.

This is green belt land and I suggest you concentrate on re-using brown field sites in the area, such as the whole of the Wisley airfield site.

The road of Send Hill is far too narrow and is congested to the point of being impassable during school morning and afternoon traffic periods and is already a “no go” area to the existing residents during those times.

Why does the Council persist in these anti-social lines of thought when obvious brown field sites should be used more readily and legally, without affecting the existing long suffering public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2974  Respondent: 10818017 / Nigel Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Correct title of Policy A28 to say *Ash Green*, and not *Ash*.

• Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

• Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“*Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.*”

2331
• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. a) The Street in Tongham
2. b) A331/A323 intersection
3. c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:
  “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

| Comment ID: | pslp171/1351 | Respondent: | 10818017 / Nigel Draper | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy P3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy P3 - Countryside**

   Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 **Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 **Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in • maintaining the separate identity of Ash, Tongham and Ash Green.”

**Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

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Comment ID: PSLPA16/155  Respondent: 10818177 / Heather Coussens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAFT LOCAL PLAN SITES A42, A43, A44 – PLEASE PASS LETTER TO INSPECTOR

I object as a Send resident to the number of new house builds being proposed in Send, Send Marsh and Burnt Common. 485 is excessive. 20,000 comments from the first local plan in 2014 resulted in the number of 431 being reduced down to 185. 485 houses could mean 1940 people and 970 cars. Plus I object to our elected Council allowing and passing A43 for the 400 homes so late on in the proceeding when no one else had chance to view it. The doctors and school here will not cope Send is already getting new house building on the Vision/Engineering site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/175  Respondent: 10818177 / Heather Coussens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
DRAFT LOCAL PLAN SITES A42, A43, A44- PLEASE PASS LETTER TO INSPECTOR

I object as a Send resident to the above proposals.

1. The number of new house builds being proposed in Send, Send Marsh and Burnt Common. 485 is excessive and not necessary. 485 houses could mean 1940 people and 970 cars. The infrastructure will not be able to cope. There are already new houses to be built on the Vision Engineering site.

2. I object to the 7000 sq m of warehousing being included in A43. Burnt Common already has warehouse facilities further down the road not near housing.

3. I object to the amount of extra traffic and pollution these proposals will bring to an already Busy area. The permission for the Marina is soon to test this further.

4. I object to the proposal of Send being removed from the Green Belt. Our Green Belt is an area separating us from Guildford and Woking, plus a safe haven for wildlife. There are many ancient trees around this area, especially in the A43 proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/222  Respondent: 10818177 / Heather Coussens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 7000 sq m of warehousing being included in A43. Burnt Common already has warehouse facilities. I do not see the need for an industrial park with HGV’s rolling in and out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/468  Respondent: 10818177 / Heather Coussens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of extra traffic and pollution these proposals will bring. It currently takes me 3 minutes at 8.45am to exit from Boughton Hall Ave, cross the carriageway and join the Portsmouth Road to join Send Barnes Lane going into Woking. I then queue all the way down the hill into Send. At night I have the same long journey. Any problems on the A3 send traffic along the Portsmouth Road too. The volume is already set to rise, regardless of many objections following the Council's permission for the building of Send Marina.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal of Send being removed from the Green Belt. I believed the current council wished to protect such areas. Green belt is a buffer between town and roads, plus a safe haven for wildlife. There are many ancient trees around this area, especially in the A43 proposal. I want to live in a green leafy village not a crowded, concrete mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have been forced to compose this email as I feel once again I have been let down by Guildford Borough Council.

Considering residents of Send, Send Marsh & Burnt Common raised over 30% of objections received to the draft local plan of 2016 we still appear to have been singled out unfairly by Guildford Borough Council.

I object to Policy A42 Clockbarn Nursery, Tannery Lane Send increase in houses application from 45 to 60.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/580  **Respondent:** 10818177 / Heather Coussens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A58 Land at Burnt Common, London Road. See below

Our villages of Send, Send Marsh, Burnt Common & Ripley are green sites in residential areas not industrial sites with attached villages. This is not the right area to create an industrial estate full of warehouses and industrial units. Along with workers, litter and pollution. We do not want big articulated lorries thundering past day and night. Furthermore, I am troubled to see the new policy is advocating a ‘minimum’ amount of land which can increase if required. When the idea of an industrial estate in our villages was first suggested on paper in the 2014 draft the word ‘maximum’ was incorporated though thankfully as a plan it was withdrawn from the draft due to the number of objections. Note also the 2017 Employment Land Need Assessment which has shown a reduction in the demand for industrial land. Our villages should not be subjected to an open ended policy on the final number. So why bring it back.

The area as a whole struggles daily with traffic gridlock. With the added chaos of all A3 problems making all our local roads a natural detour. Pollution rates will rise increasing health risks to all the people in the vicinity.

Keep the area green.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/66  **Respondent:** 10818241 / Vanessa Birchall-Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
I object to the plans for which the evidence base appears to have been massaged in order to indicate a robustness which is not there. The figures for the number of houses required are unnecessarily high especially when the so called evidence is being used to support building on green belt land. It begs the question what green belt means to the Council when there appears to be an enthusiasm for building a case to support this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/67  Respondent: 10818241 / Vanessa Birchall-Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the plans as, in addition to questionable evidence base it appears that the significance of the changes proposed has not been appropriately reflected in the process being followed. Full consultation should be followed as and not some kind of short cut process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/68  Respondent: 10818241 / Vanessa Birchall-Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the plan which is unsound in terms of evidence base of requirements, inappropriate building on green belt and insufficient process/ account taken of residents views

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/69  Respondent: 10818241 / Vanessa Birchall-Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the plans which appear to be unnecessary in terms of need, contravene the green belt "rules", risk reduction in the green belt and significant and unnecessary disruption and inconvenience to the current population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7554  Respondent: 10818305 / Anthony Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In December 2011 I moved from the urban sprawl of Greater London (Isleworth) to Glaziers lane Normandy. Normandy was advertised as a popular rural village situated within the Green Belt and Surrey Hills. Perfect for retirement, then the GBC published the proposed 2014 plan, which was dropped for various reasons. Two years later the council has now a new plan for 2016. I would like to express some concerns and objections with reference to site 368....

1/ EROSION OF THE GREEN BELT.

Agricultural land being used for 1100 homes, secondary and primary schools, travelling showpeople pitches with yards and also a nursing home.
This would lead to a 100% increase in the number of homes in Normandy.
The very nature of the area would be changed from green fields, woodlands with wild life, pasture and arable farmland into suburbia. Perhaps to be renamed Greater Guildford?

2/TRAFFIC CHAOS.

The proposed site is bounded by Westwood and Glaziers Lanes. These are classified as C and D roads respectively. I will concentrate on Glaziers Lane, although I understand the same problems are in evidence on Westward lane. In the 4 years of living here the amount and type of traffic has increased(few adhering to the 30mph speedlimit)

The road is in poor repair with the constant use of heavy duty trucks and double length transporters etc.
The lane has a single footpath just wide enough for 2 people to cross without going into the traffic.
The footpath on the approach to the railway bridge at Wanborough with the combination of traffic and the angle of the path makes it very dangerous to use.
There would be another increase in traffic from the number of proposed houses and schools with the daily drop offs and pick ups.

3/PUBLIC TRANSPORT.
At present there are 2 bus routes operating, one at the end of each lane from Guildford to Aldershot (Kite).
The other (520) operated 3 times a day Monday to Friday again from Guildford to Aldershot but this route incorporates both Glaziers and Westwood lanes.
The railway line from Wanborough is a twice hourly service from Guildford to Ascot.
By intimation, in the plan, the council is expecting the public transport options to be used instead of cars.
Does the council have input into the running of Southwest trains and bus services to the extent of frequency and fare levels to attract new residents/users?

4/SCHOOLS.
What evidence is there for the need of both types of school to be situated within this area.
The current schools are either expanding or are undersubscribed the only justification would be if the 1100 houses were to be built.
The present residents already send their children to existing schools.
In conclusion I would remind all concerned of election promises made with regard to protecting the green belt because once its gone its gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3761  Respondent:  10818337 / Jim Hartley  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To this end I believe that the unsatisfied demand for housing first needs to be established to be a genuine local demand for people who are either born in the locality, need to live in the locality as a consequence of their local employment or are existing residents needing to up or down size. Under current Planning Consent too many local homes have been demolished, enlarged or extended to maximise developer’s profit with an associated loss of affordable smaller dwellings. These larger houses are then often occupied by families taking advantage of the high prices obtained for inner city property and moving out to enjoy the quality of life provided by living in the Green Belt. This latter demand is not local and should not be satisfied by new developments on the Green Belt but by normal availability of existing housing stock. The Plan contains some questionable forecasts for future housing demand but no creditable proposals as to how this might be measured in reality given the timescales involved and possible changes in demographics and/or the economic climate.
Prior to any new development it’s impact on the currently overstretched road network, schools, medical services, transport and other infrastructure services needs to be properly assessed and then satisfied in advance or at least as an integral part of the Planning Approval. Your Plan relies on the future introduction of an Infrastructure Levy to be raised against all developments based on the scale of development involved. The proceeds of this levy would be used by the local authority to either fully fund or subsidise improvements to facilities and infrastructure. The Plan contains no detailed methodology by which this would be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Neither should development be in a scatter-gun fashion with simultaneous developments across multiple sites by several developers. Developments should be approved on an individual site-by-site basis phased to meet demand as it is established. Simultaneous development across multiple sites would create an open property market which encourages occupation by people moving into the Green Belt to live and commuting outside the area. Again your Plan contains no detail on the methodology by which individual sites would be released to developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In conclusion my objection to the current Local Plan is not based on what it does contain, debatable as that may be, but on what it evidently omits. This Plan is basically a consultancy report which defines a theoretical future demand and one possible means of satisfying this demand. It is devoid of any alternative solutions or any detailed strategy or policies by which future demand may be measured. Even if demand can be quantified it relies very heavily on the vagaries of the current Planning Consent process to provide any level of monitoring or control during the implementation stage. As such it is an incomplete Plan. The availability of suitable housing in the right quantity whilst protecting the Green Belt is too important an issue to be approved on the basis of this Plan. I recommend the Plan be withdraw and that Guildford Borough Council be tasked with expending as much energy and effort on producing detailed proposals for the measurement and management of future developments as they have previously spent on calculating and justifying the demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/515  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As someone who was born in Guildford, gone to school in Guildford and lived in Clandon for a large part of my life, I remain hugely uncomfortable with the proposed development plan for Wisley Airfield and Garlick’s Arch. This is not small local in-fill development for the benefit of local business it is unwarranted development of a substantial rural area which if allowed will infringe on other areas merging villages and roads in a manner more consistent with London than Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/517  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Furthermore, I fundamentally object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/516  Respondent: 10818529 / John Hales  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) with North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved. As someone who can remember as a child hearing nightingales in Clandon which is now replaced by the distant and constant rumble cars this new slip road will blight the area indefinitely and lead to irreparable damage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1159  Respondent: 10818529 / John Hales  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also appalled at the deterioration in local roads over the last 5-7 years along with the congestion that already exists which will only decline further with the lack of road infrastructure (Policy I1). There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1158  Respondent: 10818529 / John Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The green belt in Surrey has supported the quality of life of people throughout Surrey and protected the over development of areas which might otherwise by now become part of London. I fundamentally object to not protecting the Green Belt (Policy P2) and specifically to removing Ripley, Send and Clandon, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1157  Respondent: 10818529 / John Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1) given it will damage local communities by over development, especially Ripley, Send and Clandon, with no benefit for local communities. Furthermore, there are no new railway stations or bus services proposed effectively meaning, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1160  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Borough Wide Strategy (Policy S2) for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey, highlighting how singularly out of touch the proposers of this policy are with the local community. The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. The 5,036 houses proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/1708  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/1707  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

**I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch**

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

**I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch**

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1705  Respondent: 10818529 / John Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1709  Respondent: 10818529 / John Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value.”

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I moved to Send in 2015 - always desirous to live in a small friendly environment, having lived in large towns and cities most of my life. At the rate GBC plans to implement the building of thousands of new houses - WILL THERE BE ANY VILLAGES LEFT IN THE UK IN 20 YEARS TIME for my children and grand children to enjoy??

I STRONGLY OBJECT to the imminent erosion of OUR GREEN BELT land in order to build houses which are not required in such numbers (693 pa??)

A village has LANES not wide roads and the increase in traffic which all these new houses will bring (presumably two cars per household, minimum) will mean chaos in the mornings and evenings particularly - we have a junior school on the main 'road' in Send!!!!

GBC has not listened to the objections previously submitted in 2015, they undemocratically plough on with ludicrous ideas for areas which they know nothing about (HOW MANY COUNCILLORS ACTUALLY VISIT THE AREAS THEY WANT TO BUILD ON?)

THE CONSERVATIVE GOVERNMENT promised that GREEN BELT land would be PROTECTED - was that a lie?

In conclusion please address the question - Is this the way to preserve quality of life? It's not all about money surely?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/274  Respondent: 10818945 / Fabian Steele  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I consider the assessments made in the local plan are deeply flawed in respect of infrastructure.

Drains and sewage

Residents of the Horsleys are aware of the situation with flooding and drainage in the local area. The current sewage system and drains is always overwhelmed by heavy showers of rain and the drains frequently block. Before there can be any extra demand placed on these systems there would have to be a redesign of the entire system. It would require substantial reconstruction prior to any extra housing.

Roads

The Villages have mostly B roads which are unable to sustain all of the extra traffic. The roads are narrow and full of pot holes. There are crossings not suitable for large traffic volume throughout the villages. Large numbers of cyclists use the roads for training, especially at weekends. It is not possible to overtake safely on large stretches if the roads. Any increase in traffic of the volume suggested would result in gridlock and a big increase in traffic accidents.

Shops/doctors/dentists

they are insufficient to deal with all the extra people.
Before any new homes can be built the infrastructure has to be massively upgraded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2931  Respondent: 10819009 / Sheila Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the high number of new houses which are proposed in the New Local Plan. I have seen no substantial evidence to support this need. It is unacceptable that the calculations on which the numbers are based have not been subject to scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/684  Respondent: 10819009 / Sheila Griffin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the latest version of the Local Plan in which GBC is proposing to move the green belt boundary to exclude the fields behind Shalford Village Hall. These fields must be kept outside the village settlement boundary in order to exclude housing development in a totally unsuitable area.

The proposed access to the land is via Chinthurst Lane which is a narrow country lane. This is already heavily congested and dangerous to drive along.

The elevation of the land, at 32 feet above King's Road, is the highest in the area and any development would tower over the village and community activities.

Over 700 residents signed a petition objecting to the proposed settlement boundary change last year.

I hope that the views of the local residents will ensure that this latest plan does not go ahead.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12230  Respondent: 10819009 / Sheila Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford does not have the infrastructure to cope with large scale housing. It already has severe traffic problems and pollution, a shortage of school places, and pressure on GP surgeries and the RSCH resulting in long waiting times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12226  Respondent: 10819009 / Sheila Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I object to any green belt land and areas of outstanding beauty being used for housing. Brownfield sites should be used for this purpose instead of building shops and offices. We have enough shops and business premises in Guildford. Your council should force the University of Surrey to fulfil its obligation to build adequate accomodation for students and staff at Manor Park. They have planning permission for this. This would free up a large number of houses for local people who are trying to buy or rent accomodation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3249  Respondent: 10819041 / Lesley Stedman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
- I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
- I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
- I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
- I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.
- I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.
- I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
- I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
- I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
- I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
- I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.
- I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

- I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The housing demand assumptions are flawed given possible indigenous population growth and future migration within and beyond Europe and therefore do not require a massive increase in housing density in this area.

• The planning process seems overly complicated such that many hard working people will I imagine not have the time to fully engage with it.

It really troubles that at the proposed rate of development in the South East there will be little/no green built land left between Horsley and Surbiton by 2050 and it will be one continuous urban sprawl. The local authorities should take a much more cautious and prudent rate of development mindful that the demographic forecasts are probably wrong. Given the scope and scale of this ‘new plan’ which seems remarkably similar to what was previously proposed it seems to me my Local Authority are determined to rail road this through come what may!

I remain seriously concerned about this process and the scope and scale of the plan for the East Horsley area. I would therefore urge the Planning Department once again to re-consider this ‘new plan’ and propose something more appropriate. What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/224 Respondent: 10819297 / Phil Haymes Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As an East Horsley resident I am writing to formerly object to the proposed new Local Plan which seems to have ignored my previous submission, specifically:

• The loss of the Green Belt in the East Horsley area due to propose new housing developments for >500 new houses (noted below) would significantly change the character of the village and further shrink the Green Belt, will radically change what is supposed to be a ‘conservation area’ and it will inevitably lead to further urbanisation in years to come and a have serious impact on life in our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/225 Respondent: 10819297 / Phil Haymes Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The scale of the development is disproportionate to the current number of dwellings (77% increase!) and given the proposed massive development at Wisley Airfield a short distance away I believe this will place an unreasonable burden on the Horsley’s for which current stressed infrastructure (roads, schools, parking, other amenities) would not be able to cope.

From a HSE perspective volumes of traffic would significantly increase on roads already struggling to cope and one assumes would become significantly more dangerous for pedestrians and cyclists alike as traffic density increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/165  Respondent: 10819297 / Phil Haymes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to formally object to this plan as my previous objection has been ignored

FOUR of the original housing development sites remain (2000 houses).

The 2016 Local Plan was assessed as having massive and disproportionate effect on the Horsley's:

Extension of the settlement boundaries of the Horsley's into the Green Belt.

Removal of the extended villages from the green belt.

Six large housing development sites and several smaller ones in the extended development.

It seems that whatever the objections there remains a determination by the planners to drive the planning process until the authorities get their desired outcome despite the impact on local residents. I fear that by 2034 The Horsley's will become another Surbiton and all the village charm lost in pursuit of development based on flawed demographic data.

I would ask the Planning Department to take a much more holistic and balanced view and seriously challenge the data that is driving unnecessary development that encroaches on the green belt, will stress existing infrastructure to breaking point and negatively impact the quality of life of every resident in the Horsley's.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1799  Respondent: 10819329 / D Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
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<td>I OBJECT TO SEND being taken out of the Green Belt as it will allow undesirable developments and spoil the rural nature of the village. This will make it a far less desirable place to live.</td>
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<td>I OBJECT TO the number of major sites which have been added to the Local Plan. These were not in the original Consultation Document and were added at the last minute. The 2014 proposal of 430 houses has increased to 485. These changes require a full consultation period.</td>
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<td>I OBJECT TO the development at GARLICK ARCH.</td>
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<td>This proposed development of 400 houses and an industrial area of 7000 sq m is on land that contains ancient woodland which is protected by the Green Belt.</td>
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<td>IF it is found that the industrial area is required then, it should be at SLYFIELD, and not in a residential area.</td>
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<td>The 400 houses, together with the new 4 way interchange and proposed developments at WISLEY and BURPHAM will increase the traffic on the Portsmouth road and Burnt common roundabout, which are already extremely busy most of the day.</td>
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<td>These proposed developments will also result in more traffic using Send as the route to Woking. The roads through Send and Old Woking are extremely narrow with many parked cars which large vehicles have trouble in navigating on their way through.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the proposed development on land adjacent to Winds Ridge and Send hill. This is GREEN BELT land and was not part of the 2014 consultation.

The proposal is for 40 homes and includes 2 Travellers pitches on land known to be contaminated and is currently vented. Access to the site is a narrow single lane country road from Vicarage Lane or from Send. The crossroads at Send Road and Send Hill is very busy at times due to parents taking their children to and from St Bedes School.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object most strongly to the proposed local plan proposals A42, A43, A43a A44 because:

Policy A43 30ha land at Garlicks Arch Burnt Common The proposal for an additional 400 homes outlined on the above policy is not required on top of the 13,860 homes already proposed for the borough. The above site is new and was not included on the Regulation 18 draft and has not been consulted on previously. The land in question is currently designated Green Belt and is permanently protected by the NPPF which prevents merging of settlements. The site has a particular conservation aspect as it is covered in ancient woodland dating from the 16th century and would be endangered by the scale of this development. The development of these sites will create a substantial increase in local traffic through Send and Ripley villages which are already very busy and congested at peak times.

The proposed industrial development of 7000sqm is not required as the latest employment Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. If there is a need why can't this be provided on the Slyfield or other industrial estates in the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The proposed 4 way interchange onto the A3 at Burnt Common to serve this development would be a disaster for Send and Ripley as it would attract additional through traffic from the main conurbation of Woking through the villages heading for the A3 and the M25.

The villages of Send, Send Marsh and Burnt Common are currently not well served by public transport to the main conurbations of Guildford and Woking and the additional housing, and industrial units will therefore result in a substantial increase in local traffic, air pollution, parking problems, and increased accidents in these villages.

As there are no significant infrastructure improvements described in any detail in the proposal to mitigate the effect of the development sites the proposal presents a significant risk of overloading the current infrastructure in Send.

What impact will the additional traffic have on the surrounding roads in Send and Ripley and on the A3 which is already over capacity at peak times in this area?

This development site will also result in loss of wildlife in this beautiful unspoilt part of Surrey with its diverse bird life.

Have any wildlife and environmental impact assessments been carried out on any of these sites?

What additional facilities are planned to cope with the increased demand for school places, doctors and emergency services from the increase in the population?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/871  Respondent: 10819425 / MP Parrott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send should not be taken out of the green belt. Send provides a valuable green belt buffer between Woking and Guildford.

Has the council given consideration to the development of brownfield sites in the borough before destroying green belt land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1869  Respondent: 10819425 / MP Parrott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery Tannery Lane because:
The increase to 60 homes in place of 45 in the original application is too much and will worsen access and traffic problems in Tannery Lane and the A247 junction.
This development will further erode the Green Belt in our village.
The change ignores all the hundreds of previous objections.
This development will make worse the surface water flooding in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1871  Respondent: 10819425 / MP Parrott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Land at Burnt Common, London Rd.
The proposed industrial development of a minimum of 7000sqm is not required as the latest employment Land Needs Assessment 2017 (ELNA) shows a reduction in demand of 3.9 hectares for the whole borough not a huge over allocation of 10 hectares in the Green Belt in Send.
The word minimum is a change from the previous maximum in the 2016 plan.
If there is a need why can't this be provided on the Slyfield or other industrial estates in the borough which still have empty sites, instead of building on Green Belt land.

The villages of Send, Send Marsh and Burnt Common are currently not well served by public transport to the main conurbations of Guildford and Woking and the additional housing, and industrial units will therefore result in a substantial increase in local traffic, air pollution, parking problems, and increased accidents in these villages.
As there are no significant infrastructure improvements described in any detail in the proposal to mitigate the effect of the development sites the proposal presents a significant risk of overloading the current infrastructure in Send.
What impact will the additional traffic have on the surrounding roads in Send and Ripley and on the A3 which is already overcapacity at peak times in this area?
This development site will also result in loss of wildlife in this beautiful unspoilt part of Surrey with its diverse birdlife.
What additional facilities are planned to cope with the increased demand for school places, doctors and emergency services from the increase in the population?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy P2 Green Belt at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:
Access along Tannary Lane is restricted and would not be suitable for increased usage from an expansion of the Business park.
Send should not be taken out of the Green Belt. Send provides a valuable green belt buffer between Woking and Guildford.
Has the council given consideration to the development of brownfield sites in the borough before destroying green belt land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4488  Respondent: 10819489 / Susan Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the development of Wisley Airfield

There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the Garlick’s Arch site.

This proposal has been included at a very late stage and has not been consulted upon previously. It was not included in the Regulation 18 draft.

There are no exceptional circumstances to warrant the development, but there are such circumstances which make it unacceptable, such as its conservation sensitivity, being covered with ancient woodland, with trees dating back to the 16th century.

According to the Land Needs Assessment 2015 (ELNA) required employment space has reduced by 80% since the previous draft plan, so is no need for the proposed 7000 sq m of industrial development on this site. If there is eventually such need, it should be situated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4487  Respondent: 10819489 / Susan Cooper  Agent:

I object to the proposed new 4 way A3 junction

The proposed new junction could help parts of the area such as the centre of Ripley, but that benefit is entirely outweighed by the hitherto unimaginable volumes of traffic which would cause gridlock at Burnt Common roundabout as well as on the entire section of A247 from West Clandon to Woking. With these areas gridlocked, traffic would need to find alternative routes and the previously little known lanes around the area would be ruined also. This one singular act of folly would cause immeasurable damage to a wide area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9767  Respondent: 10819489 / Susan Cooper  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove Send and Ripley from the green belt

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9766  Respondent: 10819489 / Susan Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall strategy

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/319  Respondent: 10819553 / Carolyn Sansom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to strongly object to the latest draft local plan proposed by Guildford Borough Local Council.

Once again the issue of removal of Send from the Green Belt has been proposed and new housing developments planned on areas not previously considered. If all the housing and business building went ahead in and around Send/Ripley the area would be gridlocked. The increasing traffic using the M25 and A3 already has a detrimental effect on the two villages at rush hour times morning and evening.

No thought has been given to this new plan and infrastructure is not in place to deal with all the extra cars and people this will bring to the local area.

Why does Guildford Borough Planners keep trying to add new measures to local planning when residents of Send and Ripley have made their feelings known through meetings at Lancaster Hall and objection letters about previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/437  Respondent: 10819617 / Kate Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then “unprotected” like this – it is a mockery of the whole concept of protection!

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. My husband and son are both asthmatic.

9) I object to the fact the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting. It certainly appears to me that the opinions of the locals are not being listened to at all. Rumours abound concerning the investment company whose registered office is in the Cayman Islands and one has to wonder given recent exposes concerning companies from that region whether everything is actually as it should be……
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/362  Respondent: 10820385 / Marion Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I want to protest that the application for the development of Blackwell Farm and the ensuing traffic problems this will cause on the A3. This part of the A3 is over burdened with traffic and is already dangerous. The amount of extra traffic this development will cause is unsupportable given the present road infrastructure. Heavy congestion both North and South on the A3 around this development will be immense and the fact that the health services and schools are already under severe pressure means that there is no case at all for such a huge development without the supporting road, health and educational infrastructure being put into place at the time of the development. The roads around this site are not only congested but environmentally they cause huge amounts of pollution and so I would like to strongly protest that this application to develop this site is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/575  Respondent: 10820385 / Marion Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object strongly to the development of Blackwell Farm and the Hogs Back. I believe building 1,500 houses, a supermarket and shops, 6 travellers' sites, at least one school and to extend the University Research Park onto Blackwell Farm at this end of The Hog's Back, or indeed at any part of the Hogs Back, would overwhelm an already very congested road system.
The University, Cathedral and A3 bypass cannot cope as it is with the amount of traffic and this development is entirely unsustainable environmentally. This part of Guildford already experiences high levels of pollution and congestion and I don’t feel that we can expose our children in Onslow to any more pollution which is inevitable with such a large scale development.

I understand that new houses are needed but does the University really have to extend any further than it already has? As it is the University has built continuously on the Manor Farm and Blackwell Farm area over many many years. Why should this part of Guildford, where is there is barely any green belt still in existence, have to yet again bear the brunt of both the University overdeveloping everything in sight (once the campus was set in a green oasis and Manor Farm was a small green sports area, now all covered in concrete and buildings) or to a massive area of house building to house employees or students from the University. As the Prime Minister recently said, Enough is Enough. Please consider leaving SOME open space for our children and grandchildren to enjoy.

I understand that legally you have to put your plans out to consultation and equally realise that you never take a blind bit of notice of objections but why not, just for a change, prove that Guildford Borough Council really does listen to their residents? It would be so refreshing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/3091</th>
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I object to the lack of any evidence for the alleged housing need numbers appx d

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I object to the proposed local plan for Send on the grounds that it is ill conceived with no apparent evidence base to substantiate it. There is little reliable evidence or objective need assessment to justify such a massive development in Send’s Green Belt. There has been no environmental impact assessment. There has been no effective traffic impact assessment. Send map

I object to the scale of development proposed of between 22% and 27% respectively for Send and Send Marsh/Burnt Common is excessive, unnecessary, and destructive to our community and Green Belt. There is NO justification for an overall additional 652 houses per annum. It goes absolutely against the principles of community planning and is no more than a green light to developers backed by Guildford Borough Council to carve up rural Surrey. Send map

I object to Send being expected to take a disproportionate amount of the stated development housing need for the Borough. The inserting proposal for Send more than doubles the current amount of land to be taken out of the Green Belt. This is very misleading and is not made clear in the Local Plan. The above sites 64, 74, 75, 76, 99 total 81.6 acres, but the additional inset land for Send extends the existing settlement boundary by a further 100/125 acres. This could easily mean an additional expansion of the village in excess of 50%. This inset gives the green light for development along one mile of the River Wey contravening policy statement Para 4.231 Local Plan. It also gives a green light to developing the school playing fields contravening NPPG 81.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to site A25 Gosden Hill Farm as this is a massive overdevelopment of 2000 homes in the green belt

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I object to A35 Wisley Airfield as 200 homes that are totally inappropriate and unsustainable development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6199  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of site A43 Garlicks arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6200  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on off ramp at Burnt Common/Clandon as this will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6201  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to** site A45 The Talbot – this is overdevelopment in a conversation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**I object to** site A57 The Paddocks – 4 traveller pitches which is also inappropriately situated as it is in the heart of the village at the end of a residential street and requiring the demolishing of much needed and currently utilised garages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**I object to** any removal of any villages from the Green Bely P2

- **I object to** the blatant ignoring of the well-established policies of the Green Belt (NPPG 79-83) to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads, overcrowd our schools and put enormous pressure on the local surgery and hospitals. It will effectively join Send and Burpham along the A3 creating exactly the type of urban sprawl the Green Belt was set up to defend against. P2
I OBJECT to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in "exceptional circumstances". P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12809  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the local plan as the development is not sustainable (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12813  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the disproportionate amount of development in one area of the Borough

- I object to the proposal for a large industrial development is ill defined and unsustainable. It could mean anything between 250,000 sq ft and 750,000 sq ft of development. It will create a huge amount of traffic problems and is utterly undesirable in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/235  Respondent: 10820417 / Trevor Smith  Agent:
<table>
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<th>Comment ID: pslp172/2132</th>
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<tr>
<td><strong>I object to the proposal to insert Send Business Park from the Green Belt because:</strong></td>
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<tr>
<td>• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<tr>
<td>• There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<tr>
<td>• It will make the erosion of the green belt in our village worse</td>
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<tr>
<td>• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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</tbody>
</table>
| **I OBJECT to** the fact that these changes represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in “exceptional circumstances”.

**THERE ARE NO EXCEPTIONAL CIRCUMSTANCES IN SEND.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td><strong>I object to the Policy A42 change at Clockbarn in Tannery Lane because:</strong></td>
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<tr>
<td>• The increase in number of homes by over 30% more from 45 to 60 is excessive</td>
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<tr>
<td>• This change has ignored hundreds of previous objections made by local residents</td>
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<tr>
<td>• This will worsen traffic problems and access in and to Tannery Lane and at the A247 junction</td>
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<tr>
<td>• This will definitely made the erosion of the green belt in our village worse</td>
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<tr>
<td>• Surface water flooding which is really bad will be made worse by this change</td>
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<tr>
<td>• The River Wey Navigation will be impacted by worsening the countryside views</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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</table>
I object to the Policy A43 Change at Garlick’s Arch because:

- It ignores all of the **thousands of previous objections** made by local people
- There is no proven demand for Travelling Show people plots in this location
- It is a beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will most certainly cause the over-development of our village and the number of homes is excessive
- It is an exquisite ancient woodland that has existed from the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of the Green Belt
- It is currently has a flood zone 2 allocation and is subject to frequent flooding
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the Policy A58 at Burnt Common because:

- It was deleted from the **2014 draft** because of all the objections made previously
- The word “**minimum**” is a change from the previous “**maximum**” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse developments **in the middle of the green belt** when Slyfield and Guildford still have **empty** sites and industrial units
- The 2017 Employment Land Need Assessment shows a **reduction** in demand to 3.9 hectares for industrial land for the whole borough not a **huge over allocation of 10 hectares at Send in the Green Belt**
- The impact on the small surrounding country roads will create traffic gridlock
- It will join up existing villages and defeat the key purpose of the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3097  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed local plan for Send on the grounds that it is ill conceived with no apparent evidence base to substantiate it. There is little reliable evidence or objective need assessment to justify such a massive development in Send’s Green Belt. There has been no environmental impact assessment. There has been no effective traffic impact assessment.

2. I object to the scale of development proposed of between 22% and 27% respectively for Send and Send Marsh/Burnt Common is excessive, unnecessary, and destructive to our community and Green Belt. There is NO justification for an overall additional 652 houses per annum. It goes absolutely against the principles of community planning and is no more than a green light to developers backed by Guildford Borough Council to carve up rural Surrey.

3. I object to the blatant ignoring of the well-established policies of the Green Belt (NPPG 79-83) to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads, overcrowd our schools and put enormous pressure on the local surgery and hospitals. It will effectively join Send and Burpham along the A3 creating exactly the type of urban sprawl the Green Belt was set up to defend against.

4. I object to Send being expected to take a disproportionate amount of the stated development housing need for the Borough. The insetting proposal for Send more than doubles the current amount of land to be taken out of the Green Belt. This is very misleading and is not made clear in the Local Plan. The above sites 64, 74, 75, 76, 99 total 81.6 acres, but the additional inset land for Send extends the existing settlement boundary by a further 100/125 acres. This could easily mean an additional expansion of the village in excess of 50%. This inset gives the green light for development along one mile of the River Wey contravening policy statement Para 4.231 Local Plan. It also gives a green light to developing the school playing fields contravening NPPG 81.

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Comment ID: PSLPS16/6209  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to site A43a the on off ramp at Burnt Common/Clandon as this will increase traffic problems in the villages, not help them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/6210  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot – this is overdevelopment in a conversation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6213  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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I object to site A57 The Paddocks – 4 traveller pitches which is also inappropriately situated as it is in the heart of the village at the end of a residential street and requiring the demolishing of much needed and currently utilised garages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12816  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any removal of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12819  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that this plan represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in "exceptional circumstances".

THERE ARE NO EXCEPTIONAL CIRCUMSTANCES IN SEND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12815  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan as the development is not sustainable (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12817  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12818  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a large industrial development is ill defined and unsustainable. It could mean anything between 250,000 sq ft and 750,000 sq ft of development. It will create a huge amount of traffic problems and is utterly undesirable in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2133  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase in number of homes by over 30% more from 45 to 60 is excessive
- This change has ignored hundreds of previous objections made by local residents
- This will worsen traffic problems and access in and to Tannery Lane and at the A247 junction
- This will definitely make the erosion of the green belt in our village worse
- Surface water flooding which is really bad will be made worse by this change
- The River Wey Navigation will be impacted by worsening the countryside views

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2134  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Policy A43 Change at Garlick’s Arch because:

- It ignores all of the thousands of previous objections made by local people
- There is no proven demand for Travelling Show people plots in this location
- It is a beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will most certainly cause the over-development of our village and the number of homes is excessive
- It is an exquisite ancient woodland that has existed from the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of the Green Belt
- It is currently has a flood zone 2 allocation and is subject to frequent flooding
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2135  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the green belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on the small surrounding country roads will create traffic gridlock
- It will join up existing villages and defeat the key purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/650  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to insert Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- It will make the erosion of the green belt in our village worse
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I OBJECT to the fact that these changes represents a terrible sentence for our village. We are destined to become a suburb of the conurbation of Guildford and Woking. NPPG 83 states that the Green Belt should only be altered in “exceptional circumstances”.

THERE ARE NO EXCEPTIONAL CIRCUMSTANCES IN SEND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We are amazed at the proposals for development in The Borough particularly in relation to the Horsleys and the old Wisley Airfield to which we strongly object.

Firstly we question the basis upon which the need has been calculated, which is further brought into question by our exit from the EU.

Secondly the infrastructure in the area is already overloaded with traffic during the rush hour and it has become dangerous to cross Ockham Road on foot several older people being put at risk, at such times.

This Country is experiencing progressively higher amount of rainfall and local roads are regularly flooded causing more potholes and the dangers associated therewith also making it almost impossible for pedestrians to use the pavements without getting soaked by passing traffic.

At rush hour the A3 is already suffering with serious -delays and jams particularly at the Ripley, M25, Cobham junctions any further increase in traffic (which is inevitable if the proposed developments go ahead) would bring gridlock with all the knock on effects.

Furthermore the proposals take the villages out of the Green Belt, thus making a farce of the whole object of the belt itself: which is totally unacceptable.

People have settled in this area because of its country atmosphere quietness and its general village feeling which will all be destroyed by the proposed developments. People have paid a premium price for their houses in the μ.rea and-who is going to compensate all the residents for the inevitable decrease in property values? ·

The car parking availability at local stations is fully developed, platforms have already been extended and there is very little room for expansion, which will be necessary if the proposals are carried out.

We enclose herewith an article which we trust you will read and note it's relevance and importance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford Borough Council has failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 which show an 80 per cent reduction in employment space from the previous ELNA carried out by the Guildford Borough Council in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The required 1368 houses in the local plan is exaggerated if the population is to grow by some 20,000 in the plan we actually need 80,000 houses (based on average of 2.5 persons per household.) The Green Belt does not need to be built over. The Guildford Borough Council's transport Assessment was not available to councillors before the vote was taken on May 24th being published on 6th June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/695  
Respondent:  10820961 / D Davies  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P2 Send, Ripley and Clandon being removed from the Green Belt. Send provides a buffer between Guildford and Woking. The particularly vulnerable areas of land behind the school including playing fields and woodland. The land to the right of the cart bridge by the Wey Navigation up to the new boundary by the River Wey Navigation up to the boundary fence with Vision Engineering and Land to the left of the cart bridge going up to the old depot on the Wey Navigation. So the council can concrete over the whole area of Ripley Send and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLP16/1088  
Respondent:  10820961 / D Davies  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 Land at Garlic Arc~. This is a new site and was not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances since it is covered by and ancient woodland. The proposed industrial site if singularly not required since the latest Employment Land Needs Assessment 2015 (ENLA) shows a reduction of 80 per cent in requirement needs of employment floor space from the previous draft plan. A new four way interchange on to the A3 at Burnt common to serve this development would create gridlock. Have you ever tried crossing the road especially in the rush hour nigh impossible. This is a ridiculous idea and really needs to be looked at very carefully. A full
transparency should be made available and looked into
very carefully, otherwise grid lock will be the result. These roads are not suitable for thousands of cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/1090  Respondent: 10820961 / D Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44. Although you may say this is a small development the added traffic would add to the gridlock
situation which would arise from all these developments. Also the subsoil on this site contains landfill waste and is
currently vented and not suitable for building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2139  Respondent: 10820961 / D Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel there should be a lot more transparency from Guildford Borough Council and so that these things are not decided
behind closed doors. This transparency should also be applied to councillors.

Also putting large numbers of small houses that are not really suitable for living in with paper thin walls are put up to give
builders and property developers huge profits it's about time house were built that people can live in properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2140  Respondent: 10820961 / D Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also where are the services such as Doctors Surgeries, Hospitals, Schools at all levels, Community Centres, etc. Existing services in this area are full to capacity

Also is building on school playing fields is not a good idea as there is a national problem with childhood obesity.

Therefore I object to the Guildford Borough Council's draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/409  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft local plan

I object to the Guildford Borough Council not following the correct procedure for plans put forward at the last minute. It is deceitful and underhand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/56  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt. Policy 2 Paragraph 4.3.15

I object to the proposal to insert Send Business Park from the Green Belt

- It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the Wey navigation
- There is highly restrictive vehicular access along Tannery Lane in both directions
- Further development or expansion at this site detract from the openness of the Green Belt and is not appropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/474  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery Tannery Lane. Policy A42. I object to the policy because

- To increase to 60 from 45 homes is a third more than before.
- Traffic problems will worsen in Tannery Lane and at the A247 junction will worsen.
- It ignores hundreds of previous objections made to previous plan
- It worsens surface water flooding which is already bad
- It will make erosion of the Green Belt in the village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/475  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlicks Arch, Sendmarsh Policy A43. I object to this policy because

- It ignores thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permeant Green Belt and no exceptional circumstances exist
- It will cause over development of our villages and the number of homes in excessive
• It will exquisite ancient woodland that existed at the time of Elizabeth I, it will be destroying our heritage
• It will join up Ripley, Send and Clandon and defeat the purpose of the Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation. A lot of this area is in a flood zone
• It is contaminated by lead shot accumulated over fifty years.
• It will generate excessive traffic that will block up local roads of Ripley, Send and Clandon causing gridlock which has happened before.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/476  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road Policy A58. I object to this policy because
• It was deleted from the 2014 draft because of all the objections
• The word ‘minimum’ is changed from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in demand for industrial land.
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial spaces
• The 2017 Employment Land Need Assessment shows a reduction to 3.9 hectares for industrial land for the whole of the borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surroundings roads will create traffic gridlock which has happened before with incidents on the M25 with people stuck in cars for 5 hours or more going no where
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/328  Respondent: 10821665 / Chris Sansom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the Guildford Borough Council's Final Draft Local Plan that is trying to permit an additional 400 houses (policy A43) together with 7000 square metres of industrial space and the proposed new A3 junction at Garlick's Arch (policy A43a).

I strongly object to the proposal of removing Send's Green Belt status along with neighbouring villages. I also object to the proposed Winds Ridge/Send Hill development (policy A44) as some of the vehicles involved in its building and subsequent occupation will be exiting into Potters Lane via a narrow road on a blind bend on a de-restricted speed limit stretch of road.

We have had to endure the disruption in Send Road caused by the building of Weycott and the ongoing disturbance of the development of the Vision Engineering site. We have the prospect of further chaos yet to come with the granted approval of the marina in Tannery Lane and the additional proposal policy (A42) for 45 houses on Clockbarn Nursery.

Send does not have the suitable roads, public transport (one bus an hour each way between Guildford and Woking) or the necessary utilities infrastructure to cope with these proposals (witness the recent chaos in Potters Lane while the gas main was renewed). Even with the merging of Send First School and St Bede's Junior School, there will not be any additional capacity available for pupils generated from new housing developments. Nor will the Villages Medical Centre be able to cope with such an influx of people calling on its services. Will the existing St Bede's School site become the next target for development? Where will it all end?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1786</th>
<th>Respondent:</th>
<th>10821665 / Chris Sansom</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A42-CLOCKBARN NURSERY, TANNERY LANE

Even ignoring the fact that the Council has proposed an increase of planning permission from 45 to 60 houses on this site, the access and egress from Send Road into/out of Tannery Lane is totally unsuitable (ie very narrow and often obscured visibility) and similarly at the junction into Newark Lane (at the Ripley end of the road). The Lane is basically single track with passing areas along its whole length and there are already existing businesses established at the old Tannery/Send Business Park site.

This proposed housing development will also cause the following problems:-

An approximation of an additional 100 vehicles thus creating at least 200 movements per day, causing more pollution.

Send Primary School has no further capacity for more pupils, and local secondary schools are in a similar position.

The Villages Medical Centre has no further capacity for more patients.

The current utilities infrastructure already struggles to meet the existing demands of the village (ie low water pressure, power ‘outs’)-to upgrade the utilities to meet the increased demand will not only cause disruption to the existing customers, it will also further delay traffic.
It is a change of land usage-causing further loss of green belt/agricultural into domestic occupation, which will not only affect the view from the Wey Navigation but also, can it be guaranteed that any development here will not cause pollution to the waterway? Or cause further surface flooding?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1787  Respondent:  10821665 / Chris Sansom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43-GARLICK’S ARCH, SEND MARSH

This proposed development of 400 houses and 6/8 Travellers’ Sites will cause the following problems:-

This is a designated Green Belt area and there have been many previous objections to any plans to build on this plot. It acts as a buffer both of noise and exhaust pollution between the A3 and the old A3 (Portsmouth Road between Send and Ripley).

This proposed development will cause the following problems:-

An approximation of at least an additional 600 cars-further pollution etc.

Where will the access to the development be?

The existing public transport system could not cope at peak times with a large increase in users.

Send Primary School has no further capacity for more pupils, and local secondary schools are in a similar position.

The Villages Medical Centre has no further capacity for more patients

The current utilities infrastructure already struggles to meet the existing demands of the village (ie low water pressure, power ‘outs’)-to upgrade the utilities to meet the increased demand will not only cause disruption to the existing customers, it will also further delay traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1788  Respondent:  10821665 / Chris Sansom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A58-LAND AT BURNT COMMON, LONDON ROAD

Is there the need for in excess of 7000 square metres of industrial buildings and/or warehousing-the existing businesses create a lot of traffic movement (thus pollution) and the road seems to be a permanent car and lorry park. If additional vehicles are attracted, they will have to cross the Send/Ripley slip road where the traffic leaves the A3 at high speed, with the likelihood of serious accidents due to slow moving, heavy lorries having to traverse both lanes. This proposal was deleted from the 2014 draft plan because of the local objections raised at the time. If the planners took heed then, why try to re-introduce them now as the objections still apply.

There still seems to be plenty of space available for this kind of development at Slyfield Green and Guildford without taking away Green Belt land in Send. Also, the recent Employment Land Need Assessment showed a reduction in demand for this type of development so why does GBC want to allow this unrequired over-allocation at the expense of our village?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/517  Respondent: 10821665 / Chris Sansom  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY 2 (Para 4.3.15)-SEND BUSINESS PARK

The removal of this existing development from the Green Belt will attract further businesses to the site. As stated in my objections to A42 (above), Tannery Lane is totally unsuitable for any more traffic, especially large commercial vehicles. Additional development will detract from the natural beauty of the location beside the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2608  Respondent: 10822305 / M.J. Redfearn  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the disproportionate scale of the proposed development in Normandy, it will totally destroy our rural village environment.

We register our objections to the Normandy & Flexford strategic site

Not sufficient thought or consideration appears to have been given to this proposed development within Normandy.

To propose to virtually double the current population is just farcical, and beyond common sense, again confirming that insufficient consideration has been given to the proposed plans, the infrastructure cannot support the current village situation satisfactorily as it stands.

Yes, we have a Doctors surgery, which is constantly overloaded, and with the ageing population within the village this can only put increased pressure onto the system, without any further increase in numbers to the village.

With the proposed increase in the population, this will totally destroy the rural image of the village, which is why the majority of the residents moved here originally.

We moved here over 30yrs ago for the rural lifestyle, the village at that time had the infrastructure to support the village way of life, unfortunately for what ever reason, which makes you think of long term planning, G.B.C allowed this to be eroded away by allowing the majority of these facilities to change to residential use depriving the villagers of local amenities, which itself has increased the loading on the already overloaded road structure.

The traffic situation would appear to have been totally discounted,

on a regular basis both the A3 and the A31 are seriously overloaded which is commonly known, and as happens far too frequently an accident occurs on one of these roads, so where does the traffic try to escape to, they try to come through Ash Green, and The Wanborough Hill to gain access to the A323, which is already heavily congested, which then becomes gridlocked.

The government pledged in their election manifesto of 2015 to protect the nations green belt, this needs to be enforced, where are the exceptional circumstances, None have been demonstrated, because there are none.

By increasing the traffic through our rural village this could seriously put at risk our many listed buildings along with the road structure, 38 and 44 tonne commercial vehicles are already having a devastating effect on the roads and bridges.

The wildlife habitats within the village need to be protected, unless we do so

we will loose these for the following generations, we should surely learn from others mistakes !!!! Act before it is to late.

More and better use should be made of existing Brownfield Retail sites which are far less expensive to develop, as they already have the majority of services on site.

The planned accommodation developments on the University campus site should be for the students, this has already been approved and apparently has for some considerable time.

Doing this would then release hundreds of dwellings within the town, which should also improve the Councils finances via council taxes, as we understand that landlords letting to students are not liable for Council Tax on those properties, which as residents coping with the ever increasing Council & Parish Tax we consider totally unfair and cannot understand the logic behind it.
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPA16/3418  
**Respondent:** 10822913 / Karen Dougherty  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Comment ID: PSLPS16/6641  
**Respondent:** 10822913 / Karen Dougherty  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning
and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

In addition, a recent Outline Planning Application (16/P/00783) for a smaller development on this site was refused by GBC for many of the above reasons, not least that the Green Belt should be protected. The report states that “there are no overriding reasons that would constitute very special circumstances to justify the harm that it would cause to the Green Belt”. How then can this much larger proposed development on the same site now be seriously considered as suitable?

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

I object because the stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

I object because this site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

I object because the site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). It has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site would have an adverse effect on the integrity of the Special Protection Area and will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6642  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13944  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13939  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13941  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13942  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in yet more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have serious concerns over the planning of the infrastructure requirements and whether the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13946  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13947  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13934  Respondent: 10822913 / Karen Dougherty  Agent:
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

For Site A43 Garlicks Arch this is supported by the decision in a recent (June 2016) Outline Planning Application (16/P/00783) for a smaller development on this site was refused by GBC. The report states that “there are no overriding reasons that would constitute very special circumstances to justify the harm that it would cause to the Green Belt”. How can it therefore now be considered appropriate to include this site for Insetting from the Green Belt?

There are no exceptional circumstances that support this.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

I object that the recommendation issued by the Minister of State for Housing & Planning in June 2016 regarding protection of the greenbelt and a commitment toward identifying brownfield sites is being totally disregarded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site regularly floods several times a year and especially during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

This local plan seeks to reduce overall development in town centre and urban areas compared to 2014 by almost 10% and instead seeks to increase the overall housing development in rural and green belt villages by insetting 15 villages. The proposed increase in rural areas from 2014 to 2016 is almost 12%. This is totally disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/3980</th>
<th>Respondent:</th>
<th>10823265 / Holly Hubbard</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
<td></td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposal to move the fields behind Shalford village hall to fall within the village settlement boundary and outside the green belt.

These fields lie at the centre of village life and are a contributing factor in what makes Shalford special, and feel not too built up.

Please don’t make changes for the sake of it, but listen to what the people in Shalford say about our village, and how we want to protect this land so that the whole village can enjoy the open space and character they help create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/6270  Respondent: 10823905 / Helen Baidya  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home, it is totally inappropriate for many reasons including three reasons below:

1. This area is a Green Belt area, and as such should built on otherwise why would it be green belt and I understand that Surrey County Council has urged Guildford Borough Council to protect Green belt land - how can you have such different views considering you are elected by and serving the same people.

2. Keens Lane is a very narrow road - to get 2 small cars to pass each other means that both car need to pull over hitting the bushes/shrubs and usually one of the cars needing to stop. How would you expect 140 homes to access this lane safely, as most cars have at least 2 cars it would mean 280 negotiating the already congested lane leading into the constricted and congested and Gravetts Lane/Tangley Lane.

3. Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained.

I trust you will consider my objections at your attempt to once again build in this special and protected area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/698  Respondent: 10824065 / B. Self  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register several objections to the published Draft Local Plan.

1. Having lived at this address for 23 years, I feel that in respect of Send and Ripley this plan is disproportionate and out-of-keeping with the historical nature of this area.

2. I object, in the strongest possible terms, to re-designating areas which currently enjoy 'Green Belt' status. Something that has served well for many years should not be changed, and the evidence to do so now does not bear scrutiny, in my opinion.

3. I object to the large-scale nature of proposals for development in areas around the villages of Send and Ripley as it would result in less separation between them, with the consequent loss of identity and individuality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1094  Respondent: 10824065 / B. Self  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe that the evidence for the inclusion of policy A43 (Land at Garlick's Arch) for 400 houses is, at best contentious and, at worst brutal in its application. I strongly oppose and object to its inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2142  Respondent: 10824065 / B. Self  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I do not have confidence that if this plan is implemented the additional pressures on local infrastructure and public services would be catered for adequately.

6. I object to this plan as it would impact adversely on my current quality of life. I am, therefore, wholeheartedly against this plan, and urge withdrawal, please.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1138  Respondent: 10824065 / B. Self  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Having lived at this address for 24 years, I feel that in respect of Send and Ripley the change to the plan is disproportionate and out-of-keeping with the historical nature of this area.

2. I object. in the strongest possible terms, to the inclusion of 6 travelling showpeople plots. The clauses relating to the possibility to these plots subsequently being used for other development in the vent of insufficient interest is indicative of the lack of evidence.

3. There is no evidence of a need for 6 Travelling showpeople lots. The clauses relating to the possibility of these plots subsequently being used for other development in the event of insufficient interest is indicative of the lack of evidence.

4. The inclusion of 6 Travelling showpeople plots is contentious and brutal in its application as it would result in the area being overdeveloped.

5. There is no evidence that 6 travelling showpeople plots would enhance the life of the local community and, furthermore, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

6. This revision would impact adversely on my current quality of life.

I am, therefore, wholeheartedly against the change to Policy A43, and urge it to be rescinded please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3304  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey University and Guildford BC have identified the area as being suitable for development to meet the growing population demands. The formulae used to calculate the potential growth of those wishing to purchase their homes I believe is flawed as undertaken by a commercial company with vested interest in future development. Following Brexit there should be a reassessment which I suspect will reduce annual target.

With the planned expansion of Guildford there are I recall no new car parks planned, the vast majority of shoppers would drive to town if purchasing goods or for heavy food shopping, bus and cycle ways of no benefit in those instances and bus travel not practical. The river idea would be a leisure facility and not for main shopping.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1996  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6447  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed development of Blackwell Farm some 72 hectares of farmland and ancient woodland although reduced number of homes will still require major infrastructure investment. The area is regarded as farmland and in Green Belt. The Surrey Sports Park has expanded greatly in recent years encroaching on open spaces result of which is a dramatic increase in traffic on limited highways although the junction has had a major improvement the roads leading from Guildford and Park Barn have not increased in size or flow to meet volume of use.

Surrey University received permission for student accommodation in 2004, this has not been developed, there are also other areas within the Campus areas which could provide student accommodation such as the large open air car parks used during the day and empty evenings weekends and out of term times. The University could develop these areas on a similar to the recent planning application made by Guildford Borough Council for the open air car park and bus depot. There would be with the unused planning sufficient accommodation to house the vast majority of students which should release local housing to rent and reduce the calculated demand not to mention cut in CO2 emissions, road traffic as majority of students would be living on campus. Council Tax should also be charged an additional revenue stream to help develop the Borough amenities and road improvements.

I can see why Surrey University are not keen to explore this option as it would involve them providing commercial finance for the infrastructure, design, planning and development. Whereas by selling Blackwell Farm to developers the University would benefit from a substantial investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The expressed views of the University described recently in the Surrey Advertiser are in their interests and not the residents of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13510  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amended Plan has reduced the proposed number of new homes and stated a percentage would be affordable, there is no mention of what affordable would be, compared to Guildford property prices affordable even with benefit of various government schemes would price out local people.

Traffic proposals are key to any developments, the Draft Plan makes reference to several ideas, all subject to government funding, any development should also be subject to the road infrastructure being in place, hospital provision to provide for a growing and aged population, better access for emergency services. One suggestion in the plan is to have a traffic flow through the business park past the hospital and towards Tesco roundabout, these areas are insufficient for an increased flow, already at capacity at peak times, what impact would volume from 1800 plus homes have?

Not many families would travel by bus or from proposed rail station as the services are likely to be infrequent. Many residents would travel by car to rail station increasing CO2 emissions adding to delays in the Park area. The Onslow Park & Ride has to be accessed by car and is too far from the proposed schemes for an improved take up.

The Draft Plan makes little reference to leisure and recreational increased facilities for the expanding population at family affordable prices, not the inflated hire costs at Surrey Sports Park which can be paid by adults but not the young of the Borough. Where are the next football pitches, open spaces to kick around, basketball and netball courts which are free to use to encourage young people to be active.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13503  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I live to the West of Guildford in Onslow Village in an area blighted by increased traffic volumes morning day and night in particular the A3 and Farnham Road.

The road network is totally inadequate to provide safe travel today with numerous accidents on the A3 as drivers try to detour from the blockage of the A31 Hogs Back joining A3 and those trying to exit to the Surrey Sports Park, Business Park University and Hospital.

When we moved to our present home 10 years ago the morning traffic would start building at about 6:30am and ease of by 6:30 in the evening, weekends were generally quieter. Now the morning rush starts about 5:00am and continues after 7:00 pm, weekends the A3 in both directions is busy all day.

Although the new draft plan has proposals to increase the exit lanes to University, Business Park etc for 2017 and to make a new junction with A3/A31 in 2022 for proposed development off the A3 neither will address the issue of volume for this area, more houses will dramatically increase traffic, pollution, not to mention overloading of water and sewage services which are at near capacity and affect the quality of life for Guildford residents. The A31 Farnham Road is extremely busy from early morning with a large number of drivers using Onslow Village as a rat run to beat the A3 tailbacks which is a problem with local schools and village shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13512  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development is a natural progression if there is justifiable proof of demand. However I believe the reports and analysis which are based on hypothetical assumptions are heavily weighted to support the Guildford Borough Council Draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1029  Respondent: 10824385 / Ian Macfarlane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS1545</th>
<th>Respondent: 10824385 / Ian Macfarlane</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLP13393</th>
<th>Respondent: 10824385 / Ian Macfarlane</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLP13395</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3394  Respondent: 10824385 / Ian Macfarlane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1004  Respondent: 10824417 / Joy Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are writing to confirm that we object to the proposed changes to move the green belt boundary to exclude the fields behind the Shalford Village Hall and to extend the village settlement boundary to include these fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/4099</th>
<th>Respondent:</th>
<th>10824705 / TK Williams</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly object and oppose the proposal to remove Fangate Manor from the Green Belt. In discussion with East Horsley Parish Council, Sir Robin Gill (owner of Fangate Manor) says he has no plans for any development on his land despite the fact that he (Sir Robin Gill) has made previous applications for development on Fangate Manor during the last 30 years. If this is the case, we are at a loss to understand why Sir Robin Gill is seeking to remove his property and land from the Green Belt.

We have been residents of Manor Close for 30 years and our boundary backs on to his land at Fangate Manor. Any development at this property would precipitate a loss of amenity, wildlife and general ambience to all residents at Manor Close.

We and all other property owners in Manor Close do not intend to allow any access nor exit from the field at Fangate Manor onto the south spur road of Manor Close. This strictly a private road. The road and its verges are owned by Manor Close Residents Association.

We at Manorfield, have never witnessed any access nor exit from the field at Fangate Manor onto the south spur road in Manor Close during our 30 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the Guildford Borough Council plans to inset East/West Horsley from the Green Belt.

Also, I strongly oppose the GBC plans to propose a major housing building programme in both East/West Horsley and on the old Ripley Airfield. I find the whole scheme totally abhorrent. My reasons are as follows:-

1 The local infrastructure is already overloaded and up to its limits. The schools are full. The medical services at Horsley Medical Centre are stretched to capacity and the drainage on the roads cannot cope. As it is; the roads flood with heavy rain.

2 The local railway stations will not be able to cope with approx an extra 1500 persons. The rush hour trains are already full and there will be insufficient car parking space. There certainly is no adequate bus service in the area.

3 The proposals to build what amounts to another Surrey village on Ripley Airfield is ridiculous. 2100 new houses means at least 4000 cars.

How can our beautiful rural villages accommodate these unacceptable proposals from Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2686   Respondent: 10824929 / Emma Jenkins   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to new local plan

I object to Send village, Wisley, Clandon and Ripley being removed from the Green Belt. We bought our house in this village to be outside of the hustle and bustle of Guildford or Woking and to bring up our children in a small village environment. This environment will be ruined by these plan.

I object to the number of homes that the plans intend to deliver.

I object to the new 4-way on/off ramp to A3 at Burnt Common (A43a). This will not alleviate traffic in Send, Ripley or Clandon. I believe it will make it worse. And it will enable further development.

I object to the inclusion of Green Belt within the proposed new Village boundaries (which is very likely to lead to more development in the future)

I object to Garlick's Arch proposal (Policy A43) to build 400 houses and 7000 sq. Metres of light industrial warehousing. This is literally on our doorstep and the increased traffic and noise would be unbearable.

I object to the destruction of the Green Belt in this area, including the development of 2,000 homes at Gosden Hill Farm, Merrow (Policy A25) which is in clear contravention of the central Government's stated commitment to Green Belt protection.

I object to the last minute inclusion of new sites with less than 2 weeks notice. Due process has not beed followed.
I object to the limited consultation period which doesn't give residents enough chance to digest everything and the impact this will have on their lives.

I object to policy A44 involving 1.9 ha of land to be designate for 40 homes and 2 travellers' pitches. This is new and was not included in the regulation 18 draft, and has not be consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt Status.

The Green Belt was intended to be permanent, as required by National Planning policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation.

If we had wanted to live in an urban environment we would have bought a house in Guildford or Woking. We bought into the beautiful countryside on our doorstep. These plans will be devastating for the villages of Send, Clandon and Ripley and I wholeheartedly object to them.

I would like my comments to be given to the planning inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2015  Respondent: 10824961 / Debby Fieldus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to further development at Clockbarn Nursery – Tannery Lane is far too narrow to take any more traffic. The junction onto the Send road is already dangerous and will be made much worse if this development is allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2016  Respondent: 10824961 / Debby Fieldus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the building of 400 houses and 7000 sq metres of industrial space at Garlick’s Arch opposite Send Marsh. This land floods and is ancient woodland it provides a very necessary pollution and noise barrier between the A3 and the residents of Send.

The Industrial Space if indeed needed, should be located at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2014  Respondent: 10824961 / Debby Fieldus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to a new interchange with the A3 at Burnt Common – Send Road which is already overloaded would become gridlocked. Send would just become a “cut through” and a “rat run” for traffic to and from the A3, M25 and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4287  Respondent: 10824961 / Debby Fieldus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I object to Send village being removed from the Green Belt. The Green Belt was intended to be permanent – local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Sends Green Belt provides and essential buffer between Woking and Guildford becoming one large urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2992  Respondent: 10826145 / Terry Fieldus  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to further development at Tannery Lane – this road is far too narrow and twisty to take any more traffic and the junction with Send road is already very hazardous.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the development at Garlick’s Arch – this land is part of an ancient woodland with trees which have existed since the 16th century. This land is also prone to flooding and is a necessary buffer between the A3 and the residents of Send.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to a new interchange with the A3 at Burnt Common as when there is stationary traffic on the A3 (which is often the case) – traffic trying to join the A3 will back up onto Burnt Common Roundabout and cause major congestion to the connecting roads of Send and down into Ripley.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I have a number of concerns in relation to the proposed removal of site A39 and Horsley overall from the green belt:

- **There is no safe access to this proposed site.** The access proposed raises major Health & Safety issues. Even at present the close proximity of the railway bridge means access from driveways to Ockham Road North at this point is restrictive & dangerous in normal hours. At peak commuting and school hours this is even worse and becomes very dangerous and accidents have happened at this point.

- **Local flooding is a major concern at this site**. The proposed site builds on land which is at the moment acts as a flood plain curbing the issue which already exists about local flooding which doesn’t just occur with heavy downpours but also with light rain showers.

- At this point **Ockham Road North becomes dangerous** as it floods beyond the curb height and as such pedestrians and cars are put in danger

- Many houses on Ockham Road North **experience significant domestic flooding** and this site will make them even more susceptible. The flood issue also has a major impact on domestic drainage and means that toilets, sinks and bath water backs up and becomes a health & safety issue. This site will substantially increase the susceptibility of the local housing and infrastructure to the risk of flooding.

- **False criteria for proposing to take Horsley from green belt**. There is a lack of understanding of the area in relation to the description and therefore false criteria on which the draft has been proposed eg: The East vs West Horsley point above, the designation of Station parade is completely misleading and bears no resemblance to a few village shops and a small franchised convenience store and an infrastructure which can ill cope with existing residential need.

- **Infrastructure**: No-where in the plan has infrastructure been addressed. It is already an intolerably long wait to access the local GP’s and dentists at a base level. Nor is there any mention of the already inadequate lane (they cannot even be designated as roads) & footpath structure.

- **Local employment is minimal** and the majority of the resident population have to travel to and from the village using either an already inadequate road system or public transport and no additional car parking which again is already limited.
• Overall the proposal to take Horsley from the green belt and this proposed site does not take into account major flooding and infrastructure issues and as a consequence is at best not viable and at worst dangerous at a number of levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5846  **Respondent:** 10826177 / Paul Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have a number of concerns in relation to the proposed removal of Horsley from the green belt and site A39

? There is no safe access to this proposed site. The access proposed raises major Health & Safety issues. Even at present the close proximity of the railway bridge means access from driveways to Ockham Road North at this point is restrictive & dangerous in normal hours. At peak commuting and school hours this is even worse and becomes very dangerous and accidents have happened at this point.

? Local flooding is a major concern at this site. The proposed site builds on land which is at the moment acts as a flood plain curbing the issue which already exists about local flooding which doesn’t just occur with heavy downpours but also with light rain showers.

? At this point Ockham Road North becomes dangerous as it floods beyond the curb height and as such pedestrians and cars are put in danger.

? Many houses on Ockham Road North experience significant domestic flooding and this site will make them even more susceptible. The flood issue also has a major impact on domestic drainage and means that toilets, sinks and bath water backs up and becomes a health & safety issue. This site will substantially increase the susceptibility of the local housing and infrastructure to the risk of flooding.

? False criteria for proposing to take Horsley from green belt. There is a lack of understanding of the area in relation to the description and therefore false criteria on which the draft has been proposed eg: The East vs West Horsley point above, the designation of Station parade is completely misleading and bears no resemblance to a few village shops and a small franchised convenience store and an infrastructure which can ill cope with existing residential need.

Horsley Planning Objection: June 2016 2

? Infrastructure: No-where in the plan has infrastructure been addressed. It is already an intolerably long wait to access the local GP’s and dentists at a base level.

? Lanes: There is no mention of the already inadequate lane; as they cannot in most situations be designated as roads; & footpath structure which are already inadequate and poor in structure.

? Local employment is minimal and the majority of the resident population have to travel to and from the village using either an already inadequate road/lane system or public transport and no additional car parking is planned which again is already limited. Overall the proposal to take Horsley from the green belt and this proposed site does not take into account major flooding and infrastructure issues and as a consequence is at best not viable and at worst dangerous at a number of levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the grossly overstated future housing need that underpins the Guildford Borough Plan. I accept new housing is required, but I question the assumptions that have been used. I believe if a more realistic assumption was used, it would be possible to accommodate new housing within existing urban brownfield areas.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposed 45 houses at Clockbarn as the existing roads (Tannery Lane) are very narrow and struggle to cope with current traffic levels. Adding further houses would cause major traffic issues all day long that would also impact Send and Send Marsh areas. In addition, permission has already been granted for a marina development that current infrastructure will not be able to cope – a second development is just nonsensical.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object in particular to the proposed development at Garlick’s Arch. The proposed 400 houses and commercial units would completely swamp existing local roads, schools & medical facilities. This would be further exacerbated by the proposed new interchange onto the A3 at Burnt Common that I also strongly object to. Current traffic levels are already too high around Burnt Common. Expanding the A3 junction would cause gridlock all day along A247 and Portsmouth Road. I also object to the Garlick’s Arch proposal on the grounds that it was not included in the previous consultation in 2014, and was added to the current proposed plan at very late notice, preventing proper due diligence from all interested parties. I also object to the proposed commercial development, as I believe it would make far more sense to expand the current commercial Slyfield area where I understand land is available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12139  Respondent: 10826209 / David Rider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to removing Send from the Green Belt. Green Belt exists for very good reasons to help protect the countryside from inappropriate development. Once areas are removed from the Green Belt and developed, there is no going back. If the GBC Plan is not reconsidered the scale of development in the Green Belt along the A3 corridor would completely change the character of the area and cause considerable congestion as the A3 and local roads would not be able to cope. The A3 is already congested without this scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2804  Respondent: 10826209 / David Rider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expanded size of this plot from 45 to 60 homes in an area with very narrow existing roads. Currently, there are significant traffic jams in the immediate areas during morning and evening, and adding 60 homes will cause considerably more congestion on roads that are not designed for such levels of use. Furthermore, the views and sense of local countryside in this area will be lost with this increase in new housing. Existing Send school and medical facilities will not be able to cope with a further 60 families needs and hence new residents will have to travel further to schools and medical facilities outside the area causing further traffic congestion.
I object to the revised proposal for this plot as it will significantly eradicate the green belt area that delineates Ripley and Send, and create very significant increase in traffic from 400 homes that will totally swamp the existing modest local roads, especially Portsmouth Road and the A247. These roads are already under significant pressure from current population demands with frequent traffic jams delaying journeys to school and work. In addition, local infrastructure, especially schools and medical facilities will be swamped by the significant extra demand, requiring people to traffic further to reach such facilities in other areas, further exacerbating the traffic issues. I recognise the need for some new housing in the area, but 400 homes is totally disproportionate for this relatively small area.

I object to the new allocation of a minimum of 7,000 square metre for industrial or warehousing use. I understand this was deleted from the 2014 plan, based on objections made at the time, so it is totally unacceptable to re-introduce into the latest draft Plan. I strongly object to the use of the word “minimum”, as Plans need to be capped rather than act as licence for uncontrolled expansion of the area. It is also unnecessary to build industrial plots on existing green belt area, where there is capacity to expand existing industrial areas such as Slyfield. The increase in commercial traffic around the Burnt Common area will cause inevitable gridlock and place an unacceptable burden on local residents, as traffic will need to use the small Burnt Common roundabout.
**Comment ID:** pslp172/3574  **Respondent:** 10826273 / Caroline Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to GBC changes to the draft local plan and inclusion of Blackwell Farm as a development site (Policy A26 & Para 4.1.9) as stated in the postcard which came through our door from save hogs back, which:

- Disregards an independent expert landscape study which demonstrates that part of the site merits AONB status following Natural England's forthcoming boundary review (para 4.3.8)
- Directs more office space to an extended business park [Policy E4], which will increase peak time congestion - particularly around the hospital and A &E - and will also encourage rat running through residential areas
- Ignores independent expert traffic studies, which show impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- Adds air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/3999  **Respondent:** 10826305 / E.M. Hart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Housing Needs** – My husband and I are well into our seventies and there is almost no possibilities to downsize as we find that brown field sites which have been previously developed there has been a tendency to construct large houses, with almost no consideration for first time buyers or those wishing to downsize. Any development must take into account the provision for older people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/2615  **Respondent:** 10826305 / E.M. Hart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Lack of Facilities - The village does not have sufficient facilities to support more development.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The medical centre is oversubscribed. The large number of houses proposed and increase of population would necessitate an increase of the number of doctors in the village with a larger medical centre.</td>
</tr>
<tr>
<td>• The schools would need to be enlarged. The Raleigh School site is very restricted. There is not the land available on the site to construct more classrooms and the access via two residential roads is appalling. In my opinion with any large increase of development in the village a new school would need to be constructed. This would have the advantage of releasing the existing site of the school for development.</td>
</tr>
<tr>
<td>• Water, Gas, Electricity, Sewage and Drainage – I do not believe that there is sufficient capacity to cater for the additional developments.</td>
</tr>
<tr>
<td>• Highway Safety – The roads in East and West Horsley are relatively narrow and the visibility is often poor, therefore any substantial increase in traffic would lead to more accidents. I recommend that a full traffic and capacity study should be carried out prior to any development being approved. Any necessary highway improvements should also be submitted for comment. We are often subjected to speeding cars and lorries past our house.</td>
</tr>
<tr>
<td>• Pavements in East Lane, Ockham Road South and North are narrow and as a consequence a hazard for pedestrians, especially women with prams and toddlers. The additional traffic would make matters worse.</td>
</tr>
<tr>
<td>• There is not any provision on the roads in Horsley for cyclists. I was witness to a fatal cycling accident outside my house.</td>
</tr>
<tr>
<td>• There is not sufficient parking at the railway station at present so any increase of population would exacerbate the situation. I also understand that the trains at peak hours are very crowded with standing room only.</td>
</tr>
<tr>
<td>• There is often insufficient parking in the village centre.</td>
</tr>
<tr>
<td>• A large number of new houses would completely change the character of the village.</td>
</tr>
</tbody>
</table>

The above comments are primarily concerned with East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

Of the sites proposed the area south I most strongly object to the area A41 south of East Lane. It destroys the character of the road having open land on the south side and would lead to an increase of pressure of more development to link with the remainder of housing on East Lane on the southern side.

On the above grounds I object to the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GUILDFORD BOROUGH DRAFT LOCAL PLAN

I object to the proposed local plan on the following grounds:

Green Belt – I am totally opposed to any loss of green belt land. Any loss to this important land, would create a dangerous precedence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4094  Respondent: 10826433 / Ivan Fagent  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object the councils Normandy and Flexford strategic site development.

We came to live in Normady from Surbilin in 1960 to enjoy a rural area and community. The council was then Guild Rural District Council – this subsequently absorbed into Guildford Borough Council.

The borough council by and large has rejected many planning submissions over many years to help preserve the rural environment. Many that have been approved rejected by the planning inspectors appeal, as in appropriate development in a rural area, within the Green Belt. In fact when Lord Taylor was resident in a weekend house his proposals for major development were rejected.

Why now this complete about turn?

The council is elected to represent the electorate and have a detailed knowledge of local requirements which effect local opinion.

A developer has no knowledge of local requirements – Indeed is in no way concerned for the adverse effects his proposal will have on the lives of local residents.

His sole objective is to identify a money making opportunity.

Surely the council can only have had a complete change of policy as a developer can relieve them of any of the work and financial commitment involved in the opportunity proposal. Otherwise why now this complete about turn?

You are failing in your duty of for a local community and taken an easy and disgraceful decision

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/792  Respondent: 10826497 / Barry Vince  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the new local plan.

My areas of concern:

Lack of protection of Green Belt.

Disproportionate housing development in our area, overloading schools, health services and public transport stations.

Traffic concerns on trunk roads and lanes.

Air pollution from thousands of extra cars, affecting elderly people and children.

Pedestrians and cyclists safety on overcrowded local roads with no footway.

No guarantee of enough affordable housing for young families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/129  Respondent: 10826497 / Barry Vince  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As for the increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, will have a significant impact on the already highly congested local rural road network around and within Ripley, where we live.

Please think again and do not spoil our Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/127  Respondent: 10826497 / Barry Vince  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43 Garlicks Arch

The potential increase from 400 dwellings at this site is extremely harmful to the rural nature of the surrounding villages and will cause coalescence of these lovely villages and will have a huge impact on our already congested roads.

The inclusion of 6x Travellers plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and is not identified as a need within the Local Plan and is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/56  Respondent: 10826593 / Mia Jones  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to let you know that I object to your plans to build on our green belt by putting over 400 houses and warehouses at Garlick Arch, Burnt Common, I moved to the village and paid a premium to do so, so I could bring my children up in a lovely village life and not bought up in a built up area, if I wanted to live in a built up area I would have moved to one! so having the green belt areas THAT SHOULD NOT BE BUILT ON, ensuring an nicer way of life. As it is living in the village has many more problems without adding more, the amount of traffic constantly cutting though, to reach the A3 makes going to work and driving to school a head ache, by you consenting more houses to be built, would be pure madness, the roads are just not built for the volume of traffic now let alone adding congestion to it, even by adding an extra road, I really can't see that, that will help. I'm sure you are aware, there are not enough schools in the area, it took me a long stressful time to secure school placements for my children, and getting into my local and nearest school was hell! By building 400 homes, you are looking at around 800 people plus moving in, where on earth do you think these children will go to school? As far as the GP surgery goes that is also at its limit, and getting an appointment to see your doctor is a joke, as there are not enough appointments to give out to the volume of people we have registered there now let alone adding another 800 plus people.

By sneaking these plans in at last minute is so out of order, this area SHOULD NOT BE REMOVED FROM THE GREEN BELT, and at the rate you are going both SEND & RIPPLE will no longer be villages, they will turn into as mass of houses and into a town, and that nobody wants to see happen, your plans for all these extra houses is NOT wanted or NEEDED.

These plans are new and they were not included in plans before, they are not needed on top of the 13,860 already proposed for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I moved to Send to live in the quite and pleasant village in the GREEN BELT when I retired some twenty years ago.

I OBJECT MOST STRONGLY THAT CONTRA TO ALL PROMISES FROM THE LOCAL COUNCILORS YOU WANT TO DESTROY MY PEACE AND PLEASURE IN LIVING IN THIS VILLAGE.

I object in particular to the plan to build 400 houses and industry at GARLICKS ARCH SITE as this will mean an unbearable load on local roads, Doctors, and schools.

I object to the development of the A3 junction with 2000 houses at Wisley and 1859 houses at Blackwell farm as this will give more traffic than the present road system can take. In particular heavy lorries preventing access from my road to the traffic system .

I object to the Send Hill plans to spoil the look of a quite road and give more problems of traffic flow in this area.

I object as Guildford Town has more available space on brown field sites that should be used. I do not want to be part of Guildford or Woking I want to stay in A VILLAGE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Again we are faced with proposals that appear to have been put forward with little thought and imagination and with no respect or regard for the environment or the people and wildlife who live within it. I am shocked and saddened at the radical proposals put forward that would effectively destroy residents quality of life. Recently a medical appointment in Woking was missed as I could not drive into Woking from Ripley village within 35minutes? I can only guess as to the traffic situation on the local narrow lanes and roads should this large scale development take place?

I moved to Ripley village in the borough of Guildford to enjoy the character of this charming village and beautiful surrounding countryside, believing it would be protected as promised by its green belt status. If local government believe these are good proposals, I really need to think about packing my bags.

Ripley village has recently seen a fair amount of housing development (most has been sensible and measured, in keeping in character, smaller scale housing on re-used sites. I have supported these projects and believe that it is sufficient for local needs and do not support any larger scale building proposals in Ripley village for the moment (if we are to retain the essence of the character).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3946  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East and West Horsley proposals.

Unthinkable to remove these precious, tranquil villages from the green belt.

West - the number of proposed houses here would change the very nature of the village forever.

The Narrow lanes without footpaths are completely unsuitable for the proposals.

Imposes an unsupported burden on the current infrastructure and services, totally unsuitable.

Enforces draconian development proposals totally unbalanced and unsustainable dramatically changing the character of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7358  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ockham and Wisley Airfield new town

Local transport potential is poor (local bus services have been or are about to be cut). It is about as far from a railway station as it is possible to get in this part of the borough. Local roads are narrow winding country lanes with no spare capacity.

Emissions are a serious health hazard to people in any dwellings within 500m of a motorway. The closeness of the A3 and the M25 make the health risks a problem.

Dangerous to have more traffic arriving on an already hazardous area (A3 junction).

The charming villages of Ockham, Wisley and surrounds would be completely swamped and ruined. Unacceptable amounts of traffic sent into Ripley village!

The merging of villages!

If the Airfield site were to accommodate the proposed number of ‘affordable’ homes, the impact would effectively destroy the village altogether. The character of the area would alter irretrievably and for the worse.

In my opinion this site should be returned to needed agricultural land as previous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16390  Respondent: 10828737 / Claire Dawson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Hills proposals

No to re-assessment of the village boundaries, no to development proposals outside the settlement areas all within an area classed as Outstanding Natural Beauty!

This is precious countryside valued for its beauty and wildlife that we all enjoy for our recreation.

Lastly I would like to know where are all the new home owners are going to work as I do not believe there are sufficient employment opportunities locally to support these radical plans and therefore travel will be required. As previously mentioned a greater demand on already overstretched services such as schools, healthcare, hospitals etc would be required. I already have to wait two or more weeks to see my GP.
Where is the evidence that all these homes are absolutely necessary and will the developers properties be affordable? I believe it is essential to identify brown field sites, largely in the urban areas first, either available now, or which could become available in the future plan term and what their capacity is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLP16/16389  **Respondent:** 10828737 / Claire Dawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for the opportunity to comment on the current borough policy proposals.

Once again I wish to register my objections in the strongest possible terms. I do not support any development at all on the Green Belt and believe it is totally unnecessary.

I do not support removing any villages from Green belt status nor altering the current village boundaries. I do not wish to see the merging of Woking and Guildford or Send and Ripley or the spoiling of character of the environment I have lived in all my life and enjoyed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1816  **Respondent:** 10828737 / Claire Dawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also believe my environment is worth fighting for to enable future generations to enjoy the precious green belt. I object and will attempt to make my voice heard through any legal means, including my vote.

Stop the ever increasing sprawl of London boundaries! Investment should be made to help the growth and regeneration of other regions of the country regarding employment, infrastructure and housing. Unfortunately we cannot all live in the South East!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the unfair imbalance of the Plan across the borough. With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most planned on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to removal of Brownfield site (A34) from the Plan. Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object to removal of Brownfield sites (A4) from the Plan
Site A4 in Guildford has been removed. This is a perfectly suitable housing site within the town centre and therefore with sustainable infrastructure and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site in favour of commercial retail – thereby effectively substituting Green Belt land for retail development. This proposal is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to the increase in housing proposed in Tannery Lane (site A42)
This has been increased by a third since the 2016 version of the Plan and will have a significant impact on the already highly congested local rural road network around Send. This proposal appears in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." Despite this statement there are no proposals to improve the local roads, instead.. to add more junctions with the A3 thereby increasing congestion on the Trunk and Local road network. A totally inappropriate site and a very worrying proposal for local residents!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:
“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this statement in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and therefore should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3150  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)
I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3151  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and therefore is not compliant with the minimum of 500 as stated in section 4.2.24 of the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3153  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch
The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. Ripley village has already recently provided a number of new dwellings and re-development. Further proposed local development and loss of green belt will adversely affect the character and increase traffic to an already busy location (especially when traffic incidences occur on the A3 and M25)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3155  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch
GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were:
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available and therefore there is no reason for Garlick’s Arch to be included.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3161  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5: "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this statement in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and therefore should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3152  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan itself is inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and therefore there is no “need” for the provision regarding the site A43 Garlicks Arch. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/3154  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available and therefore there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3158  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. The Council has a duty of transparency especially regarding such highly contentious issues. It appears the Council is neglecting its duty?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1458</th>
<th>Respondent: 10828737 / Claire Dawson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version states: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

The developer isn’t required to provide any ‘affordable’ homes, only to make a negotiated payment to the Council. This is very unlikely to result in the construction of any ‘affordable’ homes’.

Furthermore, the 2016 Plan stated (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. This statement has now been removed thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Send Business Park from the Green Belt (4.3.15). Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification whatsoever for it’s insetting (removal) from the Green Belt, interesting that GBC have not attempted to offer a justification? Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/278  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the hiding of development by “deferment” (A24, A25, A26, A43) This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of houses actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2887  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5933  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send. The A3 is already at capacity in this area and causes major delays accessing the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5930  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5928  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed in this area; there is already an industrial area at Slyfield. Guildford’s housing requirements have been shown to be grossly exaggerated. With proper use of brownfields sites this Green Belt site is not required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5927</th>
<th>Respondent: 10828801 / Kathryn Fox</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. Noise and pollution levels, already at excessive levels, would worsen.

6. I object to the proposed new interchange onto the A3 at Burnt Common because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5932</th>
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<tr>
<td>Document:</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the development of 40 houses and 2 traveller pitches at Send Hill, it is an inappropriate location and both I and the residents in Send do not welcome this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12014</th>
<th>Respondent: 10828801 / Kathryn Fox</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I object to the removal of Send Village from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford. The green belt was intended to be permanent.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified, the Green Belt is meant to be permanent and not continually eroded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12012  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We purchased our home in the rural village of Send and do not want to be part of a large town. The current school, doctor’s surgery and surrounding roads are already at full capacity; this large scale development is not wanted or required. The roads are already busy and congested and there is a huge increase amount of vehicles travelling over the speed limit through the village making it dangerous for the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12015  Respondent: 10828801 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt.

4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local roads unable to cope with the increased traffic gridlock in Ripley High St, Newark Lane, Send Rd/Send Barns Lane, due to large scale housing development and new junctions on the A3 would just encourage more traffic into the area on roads are already very busy and often jammed at peak times. the planned house building proposal would greatly increase traffic leading to peak time gridlock unless all local roads were widened and new link roads/bypasses built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Guildford Borough Council’s Proposed Submission Local Plan

1. Taking any land in the borough out of the green belt
2. Building a new town on Wisley Airfield

Building on green field sites throughout the borough
All greenbelt designated areas must be retained to preserve agricultural land for the production of food and the countryside for leisure/tourism.

Leave the greenbelt around Guildford alone, otherwise subtle erosion will mean the borough will resemble Greater London by 2031!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16783  Respondent: 10828897 / Christopher Merrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A more reasonable house building target be reached and agreed by the Guildford residence, hopefully keeping the balance and character of the borough.

The revised housing development target could be met by building on redundant factory and office/commercial sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/389  Respondent: 10828897 / Christopher Merrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. The Council has a duty of transparency especially regarding such highly contentious issues. It appears the Council is neglecting its duty?

13. I object to the removal of Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification whatsoever for it’s insetting (removal) from the Green Belt, interesting that GBC have not attempted to offer a justification? Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
9. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2984  Respondent: 10828897 / Christopher Merrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I strongly object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly suitable housing site within the town centre and therefore with sustainable infrastructure and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site in favour of commercial retail – thereby effectively substituting Green Belt land for retail development. This proposal is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
11. I strongly object to the increase in housing proposed in Tannery Lane (site A42). This has been increased by a third since the 2016 version of the Plan and will have a significant impact on the already highly congested local rural road network around Send. This proposal appears in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” Despite this statement there are no proposals to improve the local roads, instead, to add more junctions with the A3 thereby increasing congestion on the Trunk and Local road network. A totally inappropriate site and a very worrying proposal for local residents!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

Comment ID: pslp171/1356  Respondent: 10828897 / Christopher Merrick  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version states: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

The developer isn’t required to provide any ‘affordable’ homes, only to make a negotiated payment to the Council. This is very unlikely to result in the construction of any ‘affordable’ homes’.

Furthermore, the 2016 Plan stated (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. This statement has now been removed thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1606  Respondent: 10828961 / Carey Lodge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

<table>
<thead>
<tr>
<th>1. I object to Guildford Borough Council (GBE) not following the correct process of consultation with Send residents.</th>
</tr>
</thead>
<tbody>
<tr>
<td>In April 2016 the vastly excessive 2014 plan to build 430 houses in Send had been reduced to 185, a far more reasonable figure in relation to the size of the village. The new plan is now for 485 new houses, more than twice as many as the April plan said we needed. This should surely trigger full consultation under Regulation 18, as it will have such an impact on the village, rather than Regulation 19 which GBC are trying to do.</td>
</tr>
<tr>
<td>I object to GBC not taking evidence into account when producing the current plan.</td>
</tr>
<tr>
<td>The Employment lands Needs Assessment 2015 (ELNA) shows an 80% reduction in employment space from the previous ELNA of 2013. This surely indicates that there is no need for any further industrial space in Send Village. I object to plans for further unneeded industrial development in Send Village.</td>
</tr>
<tr>
<td>I have concerns over the assessment of housing need in Guildford. If the population of Guildford is to grow by 20,000 in the planned period this would require 800 new homes, based on the average 2.5 persons per home. There is not a need for 13,500 homes and the use of foreign students to inflate the figure in The Strategic Housing Market Assessment 2015 (SHMA) is wrong.</td>
</tr>
<tr>
<td>There is enough brownfield land in Guildford to build half of the required 800 new homes. I strongly object to GBC planning to take Send and Ripley out of the greenbelt.</td>
</tr>
<tr>
<td>I find it surprising that GBC are prepared to make such far reaching decisions when they did not have their own Transport Assessment to guide them. It suggests they want their plan to go through, no matter the consequences to Send residents. The infrastructure of Send and Ripley will not cope with such a high increase in population as envisaged under these new plans.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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**Comment ID:** PSLPS16/3071  **Respondent:** 10828961 / Carey Lodge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

<table>
<thead>
<tr>
<th>1. I object to the fact that this news it eat Garlick's Arch was not included in the Regulation 18 draft and so has not been consulted on previously. This is, surely, wrong.</th>
</tr>
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<tbody>
<tr>
<td>I object to the proposed development of land at Garlick’s Arch for housing and industrial use. We actually need 800 new homes in Guildford although GBC have suggested 13,860.</td>
</tr>
</tbody>
</table>
There is no need whatsoever to develop Green Belt land, which includes significantly important woodland, to build yet another 400 homes.

I object to the proposal for 7,000 sq m of industrial and warehousing at Garlick's Arch. It is simply not needed, as the ELNA 2015 shows an 80% reduction in employment floor space since the previous assessment. If there is a need in Guildford there are previously approved plans for industrial use at Slyfield where existing infrastructure can support development. If the Garlick's Arch development went ahead this would include a new 4-way junction with the A3 at Burnt Common that Send simply couldn't cope with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3077   Respondent: 10828961 / Carey Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to plans for a 4-way interchange at Burnt Common for several reasons. There is no need to build over Green Belt land to provide this interchange. If this junction was developed it would result in a huge increase in traffic through Send on the A247. The road is already struggling with traffic at peak times and this is only going to get worse when the new schools open in Send Barns lane. Increased traffic through the village will probably result in calls by groups to restrict parking to allow traffic flow, further implying on residents of Send and detrimental to local businesses. If the 2,000 houses proposed for both Wisley and Burpham go ahead it will only increase traffic further. I object to this proposal as Government guidance to planners was that Green Belt should only be built on if there are exceptional circumstances requiring this to happen. There are no exceptional circumstances at Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3089   Respondent: 10828961 / Carey Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. Policy A44. I object to the plan to develop land west of Winds Ridge and Send Hill. Again, this is a new site and has such was not included in the Regulation 18 draft and has not been properly consulted upon previously.

I object to this development of protected Green Belt land. Last year (2015) three pairs of Lapwings attempted nesting on land adjacent to this site. These are Red listed birds. This development would have a serious impact on the landscape of Send Hill and Potters Lane.

I object to the plan for two Traveller Pitches on this site. There is no need for any further Pitches in the Borough. The land on this site is old landfill with documented hazardous waste. Government guidance to planners was that Green Belt should only be built on if there are exceptional circumstances requiring this to happen. There are no exceptional circumstances at Send Hill.

I strongly object to the cynical manner in which GBC has added unnecessary housing and industrial proposals to our Local Plan. I cannot believe that it is legal for the development of a large road junction with huge impact to the surrounding area to be shoehorned into this plan without proper consultation. I object to GBC ignoring Government advice that Green Belt land must remain protected except in exceptional need, which does not exist in this local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6669  Respondent: 10828961 / Carey Lodge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P2. I object in the strongest terms to any suggestion that Send and Ripley are to be removed from the Green Belt. This essential protection stops uncontrolled development filling in the green spaces between settlements. The whole nature of Guildford and its surroundings is a country town surrounded by villages and green spaces for residents and visitors to enjoy. The actions of the GBC have already shown how important it is for Send to remain under the protection afforded by Green Belt legislation. The Wey Navigation is used by thousands of people in boats, on cycles and walking the countryside in this area, which would be detrimentally effected by further building on the land along the canal. There would be significant pressure to do so if protection was removed and, as shown by the approval of plans for a new marina in Tannery lane, the GBC cannot be trusted to follow the will of Send residents. Land in surrounding boroughs are also facing threats of removal from Green Belt protection. There must be a whole landscape approach to development. Current proposals are threatening to cover this part of Surrey with concrete. GBC have made repeated promises to protect the Green Belt but have failed to deliver on them. Taking Send out of the Green Belt would put huge pressure on the green spaces within the village for unwanted and unnecessary development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A42, Clockbarn Nursery, Tannery Lane.

This policy INCREASES previous proposals by a third from 45 to 60 homes. This is far too many. Tannery Lane is very narrow and the junction with Send Road is busy. this proposal will only make that worse.

Thousands of people use the Wey Navigation and its towpath recreationally every year. They do so to enjoy the countryside and views along the canal. This proposal will seriously affect the canal between the Broadmead Bridge and Tannery bridge, already built up on too much on the Send bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Policy A43 change at Garlick’s Arch because:

It ignores all the thousands of previous objections made by local people

There is no proven demand for Travelling Showpeople plots in this location and Guildford has more than enough traveller plots.

It is beautiful permanent Green Belt and no “exceptional circumstances” exist to allow development on it. Almost every week in the media Government Ministers state that the Green Belt must be protected and only developed where overarching need is proved and yet Guildford Borough Council seem determined to destroy this area of ancient woodland that existed at the time of Elizabeth 1.
It will cause over-development of our village and the number of homes is excessive. It will join up Ripley and Send and defeat the key purpose of Green Belt. It is subject to frequent flooding and is currently a flood zone 2 allocation. It is contaminated by lead shot accumulated over fifty years. It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to Policy A58** Burnt Common, London Road

It was deleted from the 2014 draft because of all the objections made previously.

There is already land at Slyfield that was planned to take further industry but this has been ignored. Send is a village, separated from Ripley and Send Marsh by narrow but important areas of green belt and will lose all character if these are built over. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

The impact on small surrounding roads will create traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal Policy 2 at paragraph 4.3.15, to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I object to the insetting of other land within Send. Already developers are looking at building on the School playing fields which, it is proposed, will be removed from green belt protection. They have even asked me my thoughts on selling them part of my garden! This is in addition to all the other proposed building and extra houses recently, currently under review and proposed on residential plots. This is all too much for the small village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4421  Respondent: 10828993 / Naomi Rider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed 45 houses at Clockbarn as the existing roads (Tannery Lane) are very narrow and struggle to cope with current traffic levels. Adding further houses would cause major traffic issues all day long that would also impact Send and Send Marsh areas. In addition, permission has already been granted for a marina development that current infrastructure will not be able to cope – a second development is just nonsensical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4420  Respondent: 10828993 / Naomi Rider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object in particular to the proposed development at Garlick’s Arch. The proposed 400 houses and commercial units would completely swamp existing local roads, schools & medical facilities. This would be further exacerbated by the proposed new interchange onto the A3 at Burnt Common that I also strongly object to. Current traffic levels are already too high around Burnt Common. Expanding the A3 junction would cause gridlock all day along A247 and Portsmouth Road. I also object to the Garlick’s Arch proposal on the grounds that it was not included in the previous consultation in 2014, and was added to the current proposed plan at very late notice, preventing proper due diligence from all interested parties. I also object to the proposed commercial development, as I believe it would make far more sense to expand the current commercial Slyfield area where I understand land is available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9624  Respondent: 10828993 / Naomi Rider  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to removing Send from the Green Belt. Green Belt exists for very good reasons to help protect the countryside from inappropriate development. Once areas are removed from the Green Belt and developed, there is no going back. If the GBC Plan is not reconsidered the scale of development in the Green Belt along the A3 corridor would completely change the character of the area and cause considerable congestion as the A3 and local roads would not be able to cope. The A3 is already congested without this scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9623  Respondent: 10828993 / Naomi Rider  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the grossly overstated future housing need that underpins the Guildford Borough Plan. I accept new housing is required, but I question the assumptions that have been used. I believe if a more realistic assumption was used, it would be possible to accommodate new housing within existing urban brownfield areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: pslp172/4242 | Respondent: 10828993 / Naomi Rider | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |
| **Clockbarn Nursery Policy A42** |
| I object to the expanded size of this plot from 45 to 60 homes in an area with very narrow existing roads. Currently, there are significant traffic jams in the immediate areas during morning and evening, and adding 60 homes will cause considerably more congestion on roads that are not designed for such levels of use. Furthermore, the views and sense of local countryside in this area will be lost with this increase in new housing. Existing Send school and medical facilities will not be able to cope with a further 60 families needs and hence new residents will have to travel further to schools and medical facilities outside the area causing further traffic congestion. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |

| Comment ID: pslp172/4243 | Respondent: 10828993 / Naomi Rider | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire): ()** |
| **Garlick’s Arch, Policy A43** |
| I object to the revised proposal for this plot as it will significantly eradicate the green belt area that delineates Ripley and Send, and create very significant increase in traffic from 400 homes that will totally swamp the existing modest local roads, especially Portsmouth Road and the A247. These roads are already under significant pressure from current population demands with frequent traffic jams delaying journeys to school and work. In addition, local infrastructure, especially schools and medical facilities will be swamped by the significant extra demand, requiring people to traffic further to reach such facilities in other areas, further exacerbating the traffic issues. I recognise the need for some new housing in the area, but 400 homes is totally disproportionate for this relatively small area. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| **Attached documents:** |

| Comment ID: pslp172/4244 | Respondent: 10828993 / Naomi Rider | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Burnt Common, Policy A58**

I object to the new allocation of a minimum of 7,000 square metre for industrial or warehousing use. I understand this was deleted from the 2014 plan, based on objections made at the time, so it is totally unacceptable to re-introduce into the latest draft Plan. I strongly object to the use of the word “minimum”, as Plans need to be capped rather than act as licence for uncontrolled expansion of the area. It is also unnecessary to build industrial plots on existing green belt area, where there is capacity to expand existing industrial areas such as Slyfield. The increase in commercial traffic around the Burnt Common area will cause inevitable gridlock and place an unacceptable burden on local residents, as traffic will need to use the small Burnt Common roundabout.

I do hope my objections will receive due consideration in arriving at the final Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6646  Respondent: 10829121 / Julie Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6648  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
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<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**I object to POLICY D2 - Sustainable design, construction and energy**

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6649  Respondent: 10829121 / Julie Brown  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**I object to POLICY D3 - Historic environment**

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6651  Respondent: 10829121 / Julie Brown  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6634  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6635  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.

- I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6636  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6638  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).

- No cost/benefit analysis of harm to Green Belt involved in extending research park.

- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.

- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6642  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6643  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6644  Respondent: 10829121 / Julie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E9 - Local centres

· No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6626  Respondent: 10829121 / Julie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H1 – Homes for all

· The policy doesn’t set any constraints on building.
· Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
· I support higher density development in the urban area
· Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
· Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.

This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY H3 – Rural Exception Homes

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY 14 Green and blue infrastructure

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

- All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6629  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6630  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.

- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6631  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6632  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P4 – Flood risk and water source protection zones

- Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6633  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6624  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object particularly to the proposed development at Garlick’s Arch and Gosden Hill Farm. The developments are out of proportion to the surrounding area and do not qualify for exceptional circumstances required to take them out of the Green Belt. In addition, I object to the planning policies as follows.

I object to POLICY S1 – Presumption in favour of sustainable development

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6625  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.

• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.

• High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A43 change at Garlicks Arche - 400 homes and 6 travelling show people plots

The plan has ignored thousands of objections from the local people of Send

There is no proof of the need for Travelling Show people plots in this location

The Village of Send is on Green Belt Land and therefore should only be built on in exceptional circumstances

The increase in houses will cause over-development of our villages

The number of homes is excessive and is not necessary

It is an ancient woodland and should be preserved

It goes against the Green Belt Policy to prevent urban sprawl

The site is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/1689  Respondent:  10829121 / Julie Brown  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A58 change at Burnt Common - Minimum of 7,000 sq m of industrial or warehousing

The word 'minimum' has been changed from 'maximum'

There is no need to build industrial and warehouse development on Green Belt Land - there are no exceptional circumstances

There will be a huge impact on local roads by the increase in traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp171/462  Respondent:  10829121 / Julie Brown  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt, Policy 2 paragraph 4.3.15 - Send Business Park taken out of the Green Belt
Taking Send Business park out of the Green Belt and further development detracts from the openness of the Green Belt
It is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/1076  Respondent: 10829281 / Kevin Nicholls  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the lack of immediate provision for new schools
i object to the lack of any immediate provision for Doctors surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/3246  Respondent: 10829281 / Kevin Nicholls  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Send Village being removed from the Green Belt. Send sits in the green belt between Guildford and Woking preventing a conurbation. This clearly goes against local Councillors promises to protect the green belt and they should be fighting proposals for any threats to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A 43. 30 - Land at Garlick’s Arch, Burnt Common, designated for 400 houses and 7000 sq m of industrial and warehousing. This site is new and was not included in the regulation 18 draft and has not been consulted upon previously (as I have alluded to above). This is a sensitive conservation area covered by ancient woodland dating back to the 16th century. There are no exceptional circumstances. The proposed industrial development of 7000 sq m is simply not required, since the the latest ELNA 2015 shows a reduction of 80% in required employment floor space from the previous draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the creation of an interchange with the A3 at Burnt Common. Having witnessed the exponential increase in traffic over the last few years and the effect it has had on local roads and the M25, this will be nothing more than a disaster for Send and the environs. There is nothing within the local plan to mitigate against the effects of such increases, which can only mean further jams and deadlock on our local roads. As a commuter who uses these roads, I am particularly concerned about the effects on the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPS16/6388 | Respondent: | 10829281 / Kevin Nicholls | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
|             | I object to building 400 houses and 7,000 square metres of industrial space at Garlick’s Arch - I bought a house in Send Marsh 25 years ago to enjoy the peace and tranquility of the villages in Send and Ripley and to bring my family up in a safe, healthy environment. The industrial area is at Slyfield where future industrial development should be. A small housing estate was built on the back of the Send Marsh estate where I live this has impacted severely on the traffic flow on and off the estate; ill thought road layouts and noise pollution. |
|             | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
|             | Attached documents: |

| Comment ID: | PSLPS16/6391 | Respondent: | 10829281 / Kevin Nicholls | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
|             | I object to a new interchange with the A3 at Burnt Common - the additional traffic from the proposed Wisley; Gosden Hill and Blackwell Farm sites would go through Send and Ripley which are already over loaded and often gridlocked. Noise and pollution levels are already excessive and should not be allowed to increase. |
|             | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
|             | Attached documents: |

| Comment ID: | PSLPS16/1758 | Respondent: | 10829281 / Kevin Nicholls | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |
|             | I object to building 400 houses and 7,000 square metres of industrial space at Garlick’s Arch - I bought a house in Send Marsh 25 years ago to enjoy the peace and tranquility of the villages in Send and Ripley and to bring my family up in a safe, healthy environment. The industrial area is at Slyfield where future industrial development should be. A small housing estate was built on the back of the Send Marsh estate where I live this has impacted severely on the traffic flow on and off the estate; ill thought road layouts and noise pollution. |
|             | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
|             | Attached documents: |
I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. This is an inappropriate location because of restricted access caused by narrow width country roads. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside. This site is also new, was not included in Reg 18 of the draft plan and has not been consulted on previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13356  Respondent: 10829281 / Kevin Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The creation of more housing will impact on the:

Roads - already in a bad state of repair; congested (frequently the 5 minute drive through Ripley from the A3 takes 15/20 minutes due to the increased traffic through the bottle neck in the village; Send has similar issues); unpassable due to increases in cars who then park on roadsides restricting traffic flow on side roads and severe traffic congestion on the A3 around the M25 and Guildford.

Public transport - trains overcrowded

Doctors/dental surgeries/hospitals - demand for appointments; treatment and operations will increase with the influx of new residents to the area but which is currently under pressure.

Policing/emergency services - the local Police station in Ripley and Woking fire station has closed; an increase in local population would necessitate more emergency service cover - will this be factored in? If so who will pay?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3795  Respondent: 10829281 / Kevin Nicholls  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a Send Village resident of 25 years and am extremely concerned about the planned developments, not only in Send but also in the surrounding areas. These plans will only serve to destroy the way of life we have enjoyed for so many years. I am also appalled at the underhandedness of the council in the way it has tried to shoehorn the plans in at the last minute.

I therefore object to the local plan but in particular:

I object to Send Village being removed from the Green Belt. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3796  Respondent: 10829281 / Kevin Nicholls  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Additionally:

- I object to all erosion of the Green Belt

I object to any “in-setting” (i.e. removal) of any villages from there Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13353  Respondent: 10829281 / Kevin Nicholls  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any ‘in-setting’ of any villages from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
<tr>
<th>Comment ID: PSLPP16/13354  Respondent: 10829281 / Kevin Nicholls  Agent:</th>
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<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to all erosion of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

Please give extra time and thought to the concerns raised by myself and others regarding any infringement on the Green Belt and local infrastructures - once it goes there will be no turning back and a decision taken today could impact detrimentally on the future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
Sir/Madam, we all understand the need to provide additional housing but to do so in such a disproportionate way will have a devastating effect on our communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/722</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the limited consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/292</th>
<th>Respondent: 10829281 / Kevin Nicholls</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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</tbody>
</table>
I am writing to object to the following:

- Policy A43 - Land at Garlicks Arch, Send Marsh.

I am extremely disappointed that GBC have decided to completely ignore the significant weight of objection from its local people and return with an even worse set of proposals.

It proves that GBC would rather prioritise a few ‘travellers’ than heed the comments from thousands of local residents - shame on you!

The latest plan will have an even worse affect on our local road networks and infrastructure, the consequences of which have been completely overlooked. The plan will destroy local green belt and devastate the villages of Ripley and Send.

The Burnt Common proposals were previously deleted from the 2014 plan due to the level of objections, so why have they been added now? To emphasise my point above, GBC have included the word ‘minimum’ in relation to the area to be considered, instead of ‘maximum’ from the previous plan. By threatening to increase the size of the industrial site, rather than decrease it, GBC have demonstrated they are not willing to listen to our concerns.

As a local resident of over 30 years, I am particularly worried about the impact the plan will have on our already congested roads. GBC’s own transport strategy recognises that the borough’s main roads are in ‘a bad place’ and yet are content to build thousands of homes without any contingency in place to manage the significant increase in traffic these plans will cause? I use the A3 trunk road every day so know what I am talking about.

The plan will also worsen the flood risk - why are GBC ignoring the current flood zone 2 allocation?

I hope GBC will come to its senses and recognise this is a flawed plan, completely disproportionate with the area and designed only to ruin local green belt and ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A42-44 Land at Garlicks Arch Burnt Common

I also object to the proposed development of some 485 houses and 2 traveller sites, which given the ratio of 2.5 people per household unit represents an increase in the population over 1200 people for the planning period. This is a substantial increase of people in a relatively small village area. Additional pressures on the local infrastructure are axiomatic, for example the Villages Medical Centre, local schools and like public services such as policing. I am unaware of any plans to increase this infrastructure, given the financial pressures on public authorities generally.

I note the traffic management proposals with regard to the A3 north facing slip roads to/from the A3 at Send ~Marsh/Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1457  Respondent: 10829313 / A.P Jackson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments/Objections on draft Local Plan

(Ripley, Burnt Common, Send Marsh and Send)

Would you please register my comments/objections on the above as follows:

1 Green Belt Issues

I am most concerned at the proposals for insetting of the above four villages, which as I understand it means removing these areas from the Green Belt.

I wish to register my formal objection to this proposal.

The insetting/removal of these four villages suggests that those areas do not make an important contribution to the openness of the Green Belt. Having referred to paragraphs 89-90 of the National Planning Policy Framework it appears that any new development construction in Green Belt areas will be considered inappropriate unless very special circumstances can be demonstrated. The Planning Authority will have applied this test and I am sure local residents will be interested to hear how this criteria was met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2246  Respondent: 10829409 / Anne Fulton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/945  Respondent: 10829409 / Anne Fulton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2166  Respondent: 10829409 / Anne Fulton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: PSLPS16/1442</th>
<th>Respondent: 10829409 / Anne Fulton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.</td>
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<td>I object to a totally unrealistic number of houses for the country lanes to absorb.</td>
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</tbody>
</table>
I object to the 20 16 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9156  Respondent: 10829409 / Anne Fulton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9531  Respondent: 10829409 / Anne Fulton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3109  Respondent: 10829409 / Anne Fulton  Agent:
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<td></td>
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<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>
**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**Objections to Guildford Borough Council's new Draft Local Plan**

I strongly object to the proposal to remove the Horsleys from the Green Belt and to the proposal to extend the boundaries of the settlement areas.

I object to the increased number of houses projected to be built on land currently in the Green Belt, more than double the number proposed per year in a previous plan. The impact on the local infrastructure, already struggling, would be disastrous.

There is already too much heavy traffic on the narrow roads; parking at the stations, shops, medical centre and village hall is at times already impossible. Drainage is inadequate, water pressure at times pathetic.

The increase in the local population would cause too much pressure on the schools, medical facilities and other services.

I also object to the proposal to build 120 houses behind Ockham Road North, land already subject to flooding. It would be irresponsible to aggravate the problem.

I object to the proposed removal of the former Wisley Airfield from the Green Belt and the subsequent development proposed which would have an enormous adverse effect on the whole area, including critically the management of traffic at the A3 junctions.

I object to the whole creeping development stretching from central London to the Horsleys destroying the local countryside so essential to the wellbeing of the population. There are plenty of brown field sites which could be considered for development with far less detrimental effect on the country as a whole.

I trust these objections will be fully and responsibly considered in the consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/564  **Respondent:** 10829889 / Geraldine Leiper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? (;), is Sound? (;), is Legally Compliant? (;)**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the detrimental impact on transport, local roads and road safety. A proposed development of 2068 homes would result in an estimated 4000 cars on already congested roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to removal of Former Wisley Airfield from the green belt. Under the NPPF no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the continued inclusion of a site (Former Wisley Airfield now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. Serious concerns about this site have been raised by Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the local plan with immediate effect.

What changes (2016)/ further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to a plan which proposes to build on the Green Belt, ample sites available without encroaching on protected green belt land.

What changes (2016)/ further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to Thames Basin Heaths Special Protection area (SPZ), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1221  Respondent: 10829889 / Geraldine Leiper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to disproportionate allocation of housing in localities of Ockham, Ripley, Send & the Horsleys (of which 65% is allocated to FWA/TFM an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3216  Respondent: 10829889 / Geraldine Leiper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly object to the revised local plan.

In particular ref A35, 3 Farms Meadows.

The local roads are at maximum capacity & the A3 is regularly gridlocked around junction 10 of the M25.

This development would be adjacent to RHS Wisley which is such a popular visitor attraction & is planning to increase its visitors which often causes problems on the surrounding roads already.

The Heathrow Beacon will remain according to NATS so this will drastically reduce these plans re height restrictions & distance required from the Beacon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to voice my strong objections to the above plan. Firstly I would point out that East Horsley is a rural village of character with narrow roads and green spaces; we are not and do not wish to become a District Centre. You must be aware that we already have vacant shop premises and have no available land space for more shops, warehousing, businesses, etc. I reiterate, we are a rural village and wish to remain so.

Thatchers and Ockham Road North, the two sites proposed for development in East Horsley are both on Green Belt land; I understand that Green Belt land can only be built on in exceptional circumstances - what are these circumstances? In addition I gather that GBC has pinpointed 3 further sites identified as LAA sites for future development, all on Green Belt land. I find this a deceitful move as these sites are not in the Local Plan and therefore information not widely known by the general public.

No mention in the Local Plan of infrastructure. The roads are congested, drains blocked, parking in the village is already a problem and Medical practice overloaded. Parking at both Horsley and Effingham Stations is full by 9.0 am.

I would like to know how GBC decided on a 25% increase in growth when the Office of National Statistics forecast a 15% growth rate. I understand new houses are needed but not on the scale you are proposing.

I object most strongly to the enormous growth in building on Green Belt land in the rural village of East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this site being on Green Belt land and that this plan has already been rejected by Guildford Borough Council.

I object to the plan because increased traffic on narrow congested rural roads will endanger lives. There is no space for cycle lanes and the access planned for the site is dangerous exiting from the A3. The parking facilities at both Horsley and Effingham railway stations are full to capacity.

I object to this plan because it will ruin the lives of many people who live in these attractive rural villages in Surrey.

Please remove this development from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/401  Respondent: 10830017 / Vicky Thornton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read your proposed local plan and particularly the suggestions with regard to East and West Horsley – including Wisley airfield.

I fully understand the need for a steady increase in new housing to meet the demands of a growing population. But your plan seems far too aggressive in its proposal to increase the size of settlement areas such as East Horsley and to effectively take the village out of the green belt. Based on previously declined proposals for Wisley airfield I fail to see how you could find a workable proposal to put a new town on this site without the essential amenities – it would become a strange ghetto.

The Horsleys should contribute to meeting the need for increased housing in the borough. But this should be done in a way that is sensitive to the current environment and without any need to remove green belt ‘status’.

I Object to your local plan as currently proposed for the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/414  Respondent: 10830017 / Vicky Thornton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident of East Horsley I write, to object most strongly to the Proposed Guildford Local Plan 2017.

The 2016 Local Plan had some serious effects on our village:

- The extension of the settlement boundaries of the Horsleys into the Green Belt
- The removal of the extended village areas from the Green Belt
- The proposal to develop six large housing sites and several smaller sites in the extended settlement area

The changes in the Guildford Local Plan 2017 are minimal, four of the original development sites remain, including the proposal for 2,000+ houses, plus sheltered/care homes, Gypsy/Traveller pitches employment/retail space and two schools on the former Wisley Airfield.

There were, I understand, over 30,000 objections to the 2016 Local Plan which identified a clear desire to limit expansion into the Green Belt. I see no evidence in the Guildford Local Plan 2017 that this plea has been heeded.

Scale of the Proposed Developments:

The developments will further aggravate the already overstretched infrastructure of both East and West Horsley. The road through East Horsley (Ockham Road North & South) is inadequate even now, and cannot be upgraded. Normal cars have to slow down just to pass each other in certain parts, and climb onto the pavement when a truck passes through.

The development plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, is only two miles from East Horsley. I am of the opinion that the Horsley area will not be able to absorb the increased population, traffic and pollution.

It is not realistic to assume that the new town will restrict itself to the Wisley Airfield area. Their daily routine will spill into the surrounding areas including East Horsley. We do not have sufficient facilities, schools, surgeries and other services. Gas, electricity and telephone services in the area are already operating at full capacity on very old pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.

Has anyone filmed the traffic on Ockham Rd at different times of the day? If you did you would see that there is so much traffic on this road and so many heavy vehicles it is a miracle that there haven’t been any more collisions. This road is too narrow for current traffic let alone the huge increase we would suffer if development of Wisley Airfield and the Guildford Plan went ahead.

The scale of the proposed Wisley Airfield development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.

Station Parade a “District Centre”?

There is a clear misunderstanding of the nature of the facilities in our village centre, it would be completely inappropriate to target the area for future urban development. Please, get out of your offices and come and see the village in action on any normal week day and week end, see how the facilities, roads, drainage etc are already overstretched. As a certain tennis player often said: You cannot be serious with these proposals!

Green Belt:

The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.
The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Housing Duncan Sandys encouraged local authorities around the country to consider protecting land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The Guildford Local Community Plan 2017 does not prevent Urban Sprawl.

Eventually when all the unoccupied flats and residences in the city of London are occupied we will find that the expansion of the green belt was not required. Don’t build on it, it won’t be needed, we have enough housing in the London area we just don’t have the right laws to make sure it’s used correctly

In short I object to the Guildford Local community Plan 2017

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2. Taking Send Business Park out of the Green Belt is ridiculous this cannot be opened up for general commercial use, the road access is not in any way suitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It appears that little attention has been paid to the previous planning objections as allowing for the fact that we need more houses our part of Guildford has been targeted disproportionate.

I must object to the additional homes suggested for Policy A42 at Clockbarn Nursery from 45 to 60 this will cause gridlock for the centre of Send, together with the additional problems of erosion of the Green Belt and exacerbate flooding problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50</td>
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I Object to Policy A43 Land at Garlick's Arch, now 400 homes and 6 Travelling Showpeople plots. The many previous objections seem to have been ignored, The permanent Green Belt is to be ruined where no exceptional circumstance exists. Send will be joined to Ripley with the many other unnecessary and unwanted proposals, including the plots for Showpeople.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5431  Respondent: 10830689 / Brian Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is also policy A58 and Policy 2 at para.4.3.15 both not required in the village.

There seems to be proposals for developments where no demand exists, and no infrastructure is in place so causing additional problems and expense for no reason I object most strongly to all the new proposals in the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2932  Respondent: 10830753 / AJ Cheeseman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery.

This number of houses is too high because of inadequate access and traffic volume in the narrow lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2934  Respondent: 10830753 / AJ Cheeseman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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I OBJECT to a new interchange with the A3 at Burnt Common.

The proposal is for a new 4-way junction of the A3 at Burnt Common. With a proposal of over 5000 new homes along the A3 at Wisley, Burpham and Blackwell Farm, the new 4-way junction will bring an unprecedented level of traffic through Send which would become gridlocked and create unacceptable levels of air and noise pollution. GBC talk about improvements to the A3 (ref About Guildford, Summer 2016) but is this to the detriment of the villages adjacent to the A3?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill.

The site of the travellers' pitches seems to have changed since the original Local Plan. The 40 houses were also not in the original Local Plan. I understand that the site is documented as unsafe landfill waste. Development would again be on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford Borough Council (GBC) have stated that 'one of the borough's biggest assets is our significant Green Belt, and major consideration is given to protecting this, with development directed at making better use of land that has already been built on under a Brown Field first preference' and that they 'have reduced the total number of development sites on the Green Belt' (ref 'About Guildford, Summer 2016).

However, in a cynical move GBC are planning to remove Send from the Green Belt thereby allowing significant development in the village. If Send is removed from the the Green Belt then it will become just an extended area of urbanisation of Woking with a detrimental effect on wildlife and the wellbeing of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/203  Respondent: 10830753 / AJ Cheeseman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful National Trust Wey Navigation;
- There is highly restricted vehicular access along Tannery Lane in both directions;
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1891  Respondent: 10830753 / AJ Cheeseman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much;
- It ignores all the hundreds of previous objections made by local people;
- It will considerably worsen access and traffic problems in Tannery Lane and at the A247 junction;
- It will make erosion of the Green Belt in our village even worse;
- It will make surface water flooding, which is already bad, even worse;
- It will impact open countryside views from the National Trust River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Policy A43 change at Garlick’s Arch because:

- 6 Travelling Showpeople plots is way out of proportion for the village and there will be an increase in juggernauts and lorries through the village as a result;
- It ignores all the thousands of previous objections made by local people;
- It is beautiful permanent Green Belt and no ‘exceptional circumstances’ exist;
- It will cause over-development of our village and the number of homes is excessive;
- It is exquisite ancient woodland that existed at the time of Elizabeth I;
- It will join up Ripley and Send and defeat the purpose of the Green Belt;
- It is subject to frequent flooding and is currently a flood zone 2 allocation;
- It is contaminated by lead shot accumulated over fifty years;
- It will generate excessive traffic that will block up the local roads of Send and Ripley;
- It will create an increase in pollution which will be detrimental to the health of the villagers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/1893  Respondent: 10830753 / AJ Cheeseman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

It was deleted from the 2014 draft because of all the objections made previously;

The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in demand for industrial land;

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units – use them first;

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt;

The impact on small surrounding roads will create traffic gridlock and extra air and noise pollution from heavy goods vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1454  Respondent: 10830785 / PE Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites chosen in Send village and nearby as they are either unsuitable or will cause chaos and gridlock for all the village and local residents. Roads, public transport, drainage, power and other facilities are already below what might be defined as a good standard. In an area already easily prone to flooding this seems either unwise or crass stupidity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5859  Respondent: 10830785 / PE Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<td>I object to the way the lack of required infrastructure has been swept to one side as if it is unimportant and the only thing that matters is getting more in homes in Guildford regardless of the effects on the existing population.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to the way the Green Belt is to be used for building when these homes seem to be far beyond the need, and the way in which figures have been put forward is dubious and unsupported. To suggest that over 60% of proposed homes should be built on Green Belt land is totally unacceptable.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the potential retraction of the promises repeatedly made at elections to protect the Green Belt. This should go down as one of the greatest crimes of the 21st Century, as it will set a precedent for all other local authorities to build over swathes of the country with no thought or regard for what is being lost forever.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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</table>
I object to the way that the previous response to the proportion of houses to be built in the village has been ignored and instead has been increased. There seems to be no valid reason for this as a) the situation post-Brexit is likely to been entirely different, and b) the number and types of houses to be built cannot be justified as we do not seem to be able to examine the way they were worked out.

I object to the way in which the proposals have been put forward as I don't believe the proper legal processes have been followed. Such development has serious consequences in relation to the quality of life for those in the immediate vicinity. Our already congested area will suffer years of disruption followed by a lifetime of over stretched facilities the promises of large developers to offer affordable housing and infrastructure (affordable to whom, we might ask?) are well-documented to be entirely unenforceable in reality.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the proposal A42 to increase the number of homes to be built at Clockbarn Nursery from 45 to 60 because any increase in traffic on this narrow road, which is already dangerous to walk or drive along, is a matter of safety. Any increase in traffic will not improve the situation and I have already objected to 45 houses, so am not likely to find 60 agreeable and neither are all the others who objected to this proposal in the past.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal A43 which would permit build houses on Green Belt land, which includes the land at Garlick's Arch. Local residents have made their feelings very clear in the past and will never willingly accept the erosion of our Green Belt just to appease developers who could use brownfield sites if they were prepared to put in the extra money required. Local services are already stretched and the added traffic will reduce everyone's quality of life.

There are no alternative routes other than back roads when traffic comes to a standstill at the moment; those 'backroads' will be unpleasant and dangerous places to live, walk or drive. Add in the vehicles of over 500 houses in Send, 1500 at Wisley and 1500 at Gosden Hill, and the area will grind to a traffic-polluted halt.

I object to the proposal A43 and A44 to include traveller pitches anywhere in the immediate area because there is absolutely no proven need for these. However, to disproportionately allot such sites in Guildford Borough as a whole on the area around Send is not acceptable as there should be a more even distribution over the entire Borough. How come Wisley and Gosden Hill are only allocated 8 each for their proposed developments of over 1500 homes, whilst Send gets 10?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2755  Respondent: 10830785 / PE Whatley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal A43 and A44 to include traveller pitches anywhere in the immediate area because there is absolutely no proven need for these. However, to disproportionately allot such sites in Guildford Borough as a whole on the area around Send is not acceptable as there should be a more even distribution over the entire Borough. How come Wisley and Gosden Hill are only allocated 8 each for their proposed developments of over 1500 homes, whilst Send gets 10?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2756  Respondent: 10830785 / PE Whatley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposal A58 to change the wording of the proposed industrial area at Burnt Common from a maximum of 7000 sq ft to a minimum of 7000 sq ft because this removes any upper limit and opens the door to any size of development in the future, with all the traffic mayhem that brings. With sites at Slyfield and in Guildford sitting empty, where is the need for this scale of industrial development?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1258</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the removal of the industrial area in Tannery Lane for similar reasons (policy 2 paragraph 4.3.15). Access to the site is wholly unsuitable for heavy traffic or large vehicles. The open areas around this site are of immense environmental importance and we owe it to future generations to preserve the Green Belt wherever we possibly can. There are absolutely no exceptional circumstances that could warrant such action, and it is in direct opposition to the views expressed by local residents in the past.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7) I object to the lack of immediate provision for new schools. The local primary (Ripley) is already full to capacity for the Sept 2016 intake.

8) I object to the lack of any immediate provision for Doctors surgeries. Already I have difficulty securing an appointment at the Villages Medical Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I object to the lack of any evidence for the alleged need of the housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) I object to villages being removed from the green belt. This will in effect lead to mass development and a string of villages all merging with each other under a tidal wave of concrete.

3) I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/179  Respondent: 10831201 / Norma Plank  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I object to the Councils increasing desire to destroy ancient woodland and open spaces, and in turn the wildlife habitats they provide, in order to develop at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/177  Respondent: 10831201 / Norma Plank  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to raise my objections to the draft local plan. I itemise the many areas below that I strongly object to:

1) I object to all erosion of the Green Belt (especially when brown field sites are not exhausted)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/139  Respondent: 10831201 / Norma Plank  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the limited consultation period and question the reasons for this.

5) I object to the last minute inclusion of new sites with less than 2 weeks notice. WHAT IS GOING ON?

10) I object to the Council turning down major developments for many valid reasons and then immediately reinstating those same developments in the draft plan with all those issues unresolved.

Please take my objections seriously. Once the green open spaces are gone they are gone forever. How can this irresponsible, narrow minded action be allowed to succeed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2815  Respondent: 10831393 / Catherine Ryder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT concerning the major doubt over the inflated number of proposed new houses using a mathematical model which is not revealed in the New Plan. It will result in a population increase which is almost 70% higher than the official national estimates for population growth in the Borough.

I do hope that you will reconsider the New Local Plan in the light of these comments. My real fear is that once the character of the Horsleys has been destroyed, there will be no going back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2816  Respondent: 10831393 / Catherine Ryder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the extension of the Settlement areas of the Horsleys.
This appears to be being considered in order to increase the land available for future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5807  Respondent: 10831393 / Catherine Ryder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of over 2,000 houses in Ockham on the former Wisley Airfield. The impact of such a huge mixed housing and commercial development only two miles away will be enormous. No adequate thought has gone into planning any appropriate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11817  Respondent: 10831393 / Catherine Ryder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the designation of Station Parade as a ‘District Centre’.
This would misread the nature of the facilities in the village centre and target the area for urban development. Has anyone actually visited our village and been into our very small convenience stores? This designation could have grave consequences for our village because it seems to permit a wide variety of town centre uses which are completely inappropriate for a village the size of East Horsley. We do not need offices, factory outlets, warehousing, tourism developments and other urban and commercial services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11815  Respondent: 10831393 / Catherine Ryder  Agent:
I OBJECT to placing further loading on an already overloaded local infrastructure.

The proposed addition of over 70% to the number of houses within two or three miles of Horsley (East and West Horsley, and nearby Ockham) has major implications for almost every aspect of life here in the village - public transport, schools, doctors and the medical centre, drainage and water supply, and roads and parking. Road traffic in this part of Surrey is already close to twice the national average. The main roads serving East Horsley are already too narrow for passing lorries, and cars are often squeezed on to the pavement. Be assured that no amount of analysis will alter the bare fact that the roads serving Horsley are not, and cannot be made, suitable for the level of building in the area that you envisage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11814  Respondent: 10831393 / Catherine Ryder  Agent:

I OBJECT to the proposal to remove the Horsleys from the Green Belt.

The Metropolitan Green Belt has endured for over seventy years and has been the backdrop to the successful evolution of our village throughout this time. To remove it is to reverse over seventy years of wise conservation. I support the need for a proportionate and sensible increase in housing, but this could happen within the constraints of the Green Belt as it has in the past. Such building needs to reflect the existing character of the village and the houses and amenities within it. The practicality is that our village's removal from the Green Belt would mean that building standards will be lowered, and developers will be allowed to squeeze additional housing into completely unsuitable places. The ‘exceptional circumstances’ required before taking this action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1181  Respondent: 10831585 / Richard Stedman  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.
- I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.
- I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.
- I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.
- I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.
- I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.
- I object to the proposal in the local plan on the grounds that the road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.
- I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
- I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.
- I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
- I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.
- I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.
- I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6485  Respondent: 10831681 / James Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery because of the inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take and more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 apartments at the Tannery and for building a marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6483  Respondent: 10831681 / James Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13541  Respondent: 10831681 / James Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3162  Respondent: 10831681 / James Cope  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3163  Respondent: 10831681 / James Cope  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no "exceptional circumstances" exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley
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I object to Policy A58 at Burnt Common because:
- It was deleted from the 2014 draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Correct title of Policy A28 to say Ash Green, and not Ash.

• Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Attached documents:

Comment ID: pslp172/4794  Respondent: 10831745 / Diane Wilsden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, it is important that the countryside to the south and east of the urban area within the urban area..."
area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

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<th>Respondent: 10831841 / S Wilsden</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Correct title of Policy A28 to say Ash Green, and not Ash.

- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green Village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area. Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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Attached documents:

Comment ID: pslp171/3209  Respondent: 10831841 / S Wilsden   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
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Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Ton gham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: PSLPA16/786  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Guildford Local Plan**

It seems to me that you propose to remove the villages of Ripley, Send, Clandon and Wisley from the Green Belt and turn them into towns by overdevelopment. There is no justification for this and no planning for the aftermath of chaos that will occur. The village roads cannot be widened, no traffic study has been carried out, no new doctor's surgeries are planned and no new schools are planned. But you propose to solve 70% of a so called housing need of 13,860 new houses by concentrating only on four villages in the Green Belt without first investigating all brown field sites in and around Guildford.

This is a planning disaster which has been made on the hoof without proper consultation or planning. In fact a new site for housing and industrial development called Garlick's Arch comprising 400 new homes has only just been proposed without warning having turned down further industrial development at Slyfield where it belongs. This is totally ridiculous and I whole heartedly object. Such a development would bring the villages of Ripley and Send to a standstill. We are already gridlocked for four hours a day in the morning and then again in the evening. Has the Highways Department undertaken a traffic study confirming that our village roads can take double the volume of existing traffic without difficulty? Is it not reasonable to assume that if narrow village roads cannot be widened then further housing in that area should be restricted to preserve the Green Belt.

Might I suggest to the Council that they revisit this figure of 13,860 houses being needed in the light of Brexit, whereby we can control and reduce the number of people coming to stay in this Country and also anticipate the vast numbers of City workers whom are to be relocated in Europe thereby freeing up a great deal of housing stock in and around Guildford.

I also object to the building of 45 houses at Clockburn Nursery because of inadequate access and traffic volume on Tannery Lane. The junction with Send road is already very difficult for vehicles trying to join the main road.

I also object to the development of 40 houses and 2 traveller's pitches at Send Hill due to its restrictive access and twisting narrow roads. The subsoil on this site contains unsafe landfill, as known to the Council.

In addition I also strongly object to the new proposed interchange onto the A3 at Burnt Common because of the obvious massive increase in traffic this will cause pouring onto village roads that are already swamped. Our village roads will become car parks and destroy our quality of life.

Please think again and ask the Highways Department where are the roads that are capable of taking increased volumes of traffic without causing gridlock. Having identified those areas the Council can then identify where a new school to cater for
the new houses is to be built and the new doctor's surgery for that area. Your current proposals are completely without merit, thought or understanding, which it seems you wish to impose with minimal or no consultation.

I very much look forward to hearing of your withdrawing the current proposals and the introduction of a more professional approach to the requirements for housing in the Borough based on detailed traffic studies, and the infrastructure contemplated to complement these new houses for public consultation and agreement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3098  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Anyway I do continue to object to Policy A42 change at Clockburn Nursery, Tannery Lane because:
The increase to 60 from 45 homes.
It ignores, as I said before, the thousands of objections by the people of Send.
It ignores the horrendous traffic problems this development will cause to village roads.
It is an erosion of the Green Belt.
It will make surface water flooding even worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3099  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A43 change at Garlick's Arch because:
Once again it ignores the thousands of objections already made by local people.
There is no proven demand for Travelling Showpeople plots in this location.
It is permanent beautiful Green Belt and no exceptional circumstances exist.
It will cause over-development of our village and the number of homes is excessive. It is an exceptional ancient woodland dating back to the reign of Elisabeth I.
It is subject to frequent flooding and is currently a flood zone 2 allocation.
It is contaminated by lead shot accumulated over 50 years.
It will cause traffic chaos and choke the village roads which are already blocked during rush hours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3101  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 at Burnt Common because:
It was deleted from 2014 draft because of all the objections made previously. The word minimum' is a change from the previous 'Maximum' in the 2016 plan and since that time there has been a decline in demand for industrial land. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt. Once again the impact on surrounding village roads will produce gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1419  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems to me that you have not listened to the thousands of objections to your proposal to remove the villages of Ripley, Send, Clandon and Wisley from the Green Belt and turn them into towns by overdevelopment. There is no justification for this and no planning for the aftermath of chaos that will occur. The village roads cannot be widened, no traffic study has been carried out, no new doctor's surgeries are planned and no new schools are planned. But you propose to solve 70% of a so called housing need of 13,860 new houses by concentrating only on four villages in the Green Belt without first investigating all brown field sites in and around Guildford. What you have done is to increase the size of developments in Send and restricted objections to these amendments. Given your practice of ignoring objections anyway it seems we live in a dictatorship where the people's wishes are not even considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/1420  Respondent: 10832129 / Christopher Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Last but not least, I object to Green Belt Policy 2 at paragraph 4.3.15 where it is proposed to inset Send Business Park from the Green Belt because: It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions. Further expansion or development at this location is totally inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3299  Respondent: 10832321 / Robert Deatker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation.

My comments are set out in this letter. I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully and un-equivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If every time there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey.
Unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is here currently, let alone the proposed developments in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/4327  **Respondent:** 10832321 / Robert Deatker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe Local Plan Response 13.06.16 the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3300  **Respondent:** 10832321 / Robert Deatker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2: Green Belt

Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt
Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. Therefore there is no need to change its status. I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. i) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal. I, accordingly, OBJECT to this proposed boundary change.

1. ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal. I accordingly OBJECT to this proposed boundary change.
In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe Local Plan Response 13.06.16 the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

INFRASTRUCTURE POLICIES This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3 These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern. I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem. I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains. Any substantial development as indicated within the Local Plan will increase hard surfaces in the area and therefore the rainfall runoff will increase into local watercourses and exasperate localised flooding.
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

Train services to and from Horsley to London on the ‘Guildford via Cobham’ line are already at full capacity at peak times. The current service has to be substantially improved BEFORE allowing further development. Such improvements should include additional train services and additional stations to support new communities.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council, South West Trains or utility companies. Surely GBC must see the infrastructure improved first before approving any new developments.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme.
It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it Local Plan Response 13.06.16 is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan. There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this. Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, I believe that this needs to be implemented earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley.

Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s. I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I therefore OBJECT to the infrastructure proposals on these grounds. I also OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

There is a legacy of approving development without the appropriate infrastructure, and the infrastructure lags to the point it cannot cope, whether this schools, trains, roads or utilities. GBC in their local plan set out a vision of development, however the details of the infrastructure upgrades needed to today are not firm legal commitments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4326  Respondent: 10832321 / Robert Deatker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to two specific boundary changes, which have been proposed, as follows:

There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility.
Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal. I, accordingly, OBJECT to this proposed boundary change.

There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal. I accordingly OBJECT to this proposed boundary change.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme.

It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it Local Plan Response 13.06.16 is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan. There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this. Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, I believe that this needs to be implemented earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s. I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan. I therefore OBJECT to the infrastructure proposals on these grounds. I also OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

There is a legacy of approving development without the appropriate infrastructure, and the infrastructure lags to the point it cannot cope, whether this schools, trains, roads or utilities. GBC in their local plan set out a vision of development, however the details of the infrastructure upgrades needed to today are not firm legal commitments.

Summary

Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY A35: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17699  Respondent: 10832321 / Robert Deatker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE POLICIES This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES I1, I2 & I3 These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern.

I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem. I would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains. Any substantial development as indicated within the Local Plan will increase hard surfaces in the area and therefore the rainfall runoff will increase into local watercourses and exasperate localised flooding.
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and

The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

Train services to and from Horsley to London on the ‘Guildford via Cobham’ line are already at full capacity at peak times. The current service has to be substantially improved BEFORE allowing further development. Such improvements should include additional train services and additional stations to support new communities.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council, South West Trains or utility companies. Surely GBC must see the infrastructure improved first before approving any new developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17698  Respondent: 10832321 / Robert Deatker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully and unequivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If everytime there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey.

Unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is here currently, let alone the proposed developments in the Local Plan.

POLICY P2: Green Belt

Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint
on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley to see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. Therefore there is no need to change its status. I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3818  Respondent: 10832321 / Robert Deatker  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan. Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy (‘Land to the south of Normandy and north of Flexford’) where a mixed used development of 1,100 homes had previously been proposed.

Whilst I have no objection to the removal of this policy site per se, I would question GBC’s decision-making process of site selection which chooses to remove this site from the local plan rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. In the updated 2017 Sustainability Assessment provided by GBC’s consultant AECOM, Wisley airfield is by some margin the site with the poorest sustainability appraisal – it has no less than 8 red flags in the AECOM criteria list. By comparison Site No. 46 in Normandy is much more sustainable yet it is the one selected to be removed from the plan.
In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC’s consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, I trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.

I therefore continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a Regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to add my voice to the many objections you will already have received regarding the above plans for the Horsleys and the surrounding villages.

My main objection is to the infringement of the Green Belt in this area. This land is of outstanding natural beauty and needs to stay this way for the future generation to enjoy.

My concern is also for the increased amount of traffic that would arise from the number of houses suggested---also the pressure on local schools; GP Surgeries; car parking at the stations and in the villages-etc.

I have lived in Horsley for over fifty years and have seen many changes during this time---but the one that really concerns me is the heavy and continuous traffic that now passes down our roads--this is dangerous now and will become seriously so if these new plans go forward. I ask you to rethink the New Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/83  Respondent: 10832673 / Lisa Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am lodging my views on the Send housing development as per below. Also, why do we need two travellers sites in Send???? What justification is there for these two separate sites? We've seen no details of traveller demographics in the area to support that. Please acknowledge this email as I tried lodging my views before and got told I couldn't email in until after a certain date!

Thank you.

I am writing to complain about the ridiculous idea that the council now has about building potentially up to 485 new houses in Send. There is absolutely no way our village would cope. The school has gone down the pan and it utterly rubbish and below par and is meant to service our village. We live in an affluent area and don't even have a decent school in sight. We can barely get an appointment for an adult at Send In Village which by the way services the surround areas of Send, the Clandon's and Ripley. It's near Impossible to get an appointment without waiting a week unless it's an emergency. We live on Potters Lane and the traffic down our road is absolutely dire and dangerous. No one sticks to the 30 mile limit. My husband had almost been knocked off his bike a few times as he cycles to woking station and back. He's had many rucks with drivers and I am forever waving at people to slow down. Someone will kill a child down this road if we are not careful. The blind corners are ridiculous for all the traffic. I have had 2 near collisions recently where I've had to slam on the break (with a toddler in the car) as as I've gone around one of the blind corners a lorry has been coming the other way taking up half my side of the road. This has happened twice lately. Then the other issue is Lorries get stuck and cause a queue and you nearly crash into the back of someone around the blind corner. My sister in law actually wrote her car off w a baby in the back, as she was going along potters lane and an old boy pulled out of send hill without hearing her coming and she smashed right into the side of his car. So the streets around here absolutely cannot take anymore cars. Absolutely no way!!! It's utterly dangerous. To think Send is a pass thro village anyway linking woking and the m3 to the other side of send - cars come from everywhere and drive through send. I do the school run everyday and can never get out of the end of woodhill because of the a3 slip road. Permanent cars coming thro and you have to sit there for ages coming into woodhill and out of it and the council think it's a good idea to increase the cars and traffic in the area by building 485 more house!!! Totally absurd and ridiculous! We literally have no facilities in Send to service anymore houses. The traffic thro ripley each
morning is ridiculous too. And take today, it was gridlocked because of a crash on the a3. Gridlocked through all the
country lanes which just shows how many people pass thro tiny old send! Our village is going to be absolutely ruined! How
on earth is anyone going to be able to move for cars? The roundabout by the shell garage at burnt common is permanently
gridlocked. You can't go anywhere in a rush in rush hour. How on earth will it be with 485 more houses when typically
most household has 2 cars and if teenagers or young adults then potentially 3 or 4 cars - but say 2 per house, that would be
a further 970 cars on average if not way more, in addition to the gridlock that already is during rush hour. Absolutely
absurd!!!!!!!!! We just go not have the facilities to support this kind of a development in our village!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4442  Respondent: 10832673 / Lisa Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am currently away but my husband has this morning informed me that there potential plans to try and build 40 houses on
Send hill plus a travellers site. It's absolutely ludicrous! Send hill is such a busy road what with the school being just off of
there and the traffic twice a day is just madness. You can't get thro there for love nor money. The end of send hill leading
into potters lane is highly annoying because only one car fits down there and you have to permanently reverse as 90 percent
of the time you come across a car coming the other way. It is a dangerous road and you have to go incredibly slow as there
are blind spots. That then brings me to the actual junction of send hill and potters lane. It is the most dangerous dangerous
spot. I have had a near miss pulling out of there. You always have to stop and put your window down and listen for traffic
before pulling out as its a complete blind spot. My sister in law was coming along potters lane minding her own business in
her car when an older man pulled out of send hill in front of her and she couldn't brake in time and smashed straight into
the side of his car with my niece who was about 5 months old. It was absolutely horrendous and could have been horrific.
She wrote her car off in the process. The crash was so loud that the people who own send farm heard it and ran out to help.
But that crossroad needs a massive massive mirror there so that people can see. My worry is that teenagers cycle to george
abbot from our road and you can't hear a bike coming along. Anyhow so how you propose building more houses and
creating more traffic up there is beyond me.

With regards to travellers sites in Send we just don't need it. What send needs is a revamp to elevate the area like its
surrounding areas such as ripley and west Clandon. The last thing send needs are traveller sites. The village shops area
needs a total revamp and the village could do with some money injected into it to make it more appealing, [Response has
been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate
discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations
between persons with a protected characteristic and persons who do not share it]. Unfortunately I'm not quite sure how else
to phrase all of this without getting to the point. But we are surrounded by lovely villages and Send does need some tlc to
try and bring it up a bit. Please see my other email with regards to my views on the ridiculous idea about building a further
400 plus houses. We do not have the facilities to maintain any of that nor the capacity to take more cars, more patients at
the practice, the school is absolutely dreadful at the moment, so much so we are paying to go private which is infuriating
that we have to do that because the school is in special measures!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Furthermore housing numbers from the 2015 (SHMA) are highly questionable.</td>
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<td>I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.</td>
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<th>Comment ID:  PSLPA16/3932</th>
<th>Respondent:  10833025 / M Wright</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Any more development in this area would surely constitute urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7334  Respondent: 10833025 / M Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn Nursery

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

Conclusion:

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

This Local Plan seems to have been thrown together with no real thought, we need a ‘common sense’ Local Plan, not this rubbish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7331  Respondent: 10833025 / M Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
<table>
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<th>Question</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>No</td>
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</table>

I object to policy A43 Garlicks Arch.

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past...
through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the
village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an
increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate
its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of
development being proposed, particularly in the north east of the borough will lead to considerable further congestion,
despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and
will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has
previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for
approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and
storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the
Green Belt (Policy P2).

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure
Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools
and doctors cope, many of which are already at capacity? (Policy I1)

This proposal was never in the regulation 18 draft, and as such has never been consulted on, and was slipped into the Local
Plan at the last minute.

This site is green belt comprising of woodland and meadows between the A3 and Send and Ripley. This site has a
particular sensitivity since it is covered in ancient woodland, some trees date back to the 16th century.

It is permanently protected by the NPFF which prevents the merging of settlements, there are no exceptional circumstances
to develop this land.

To destroy a natural boundary between the A3 and the villages would be incredibly damaging to them. The obvious
increase in pollution caused by massive amounts of extra traffic would be hazardous to health of residents young and old of
both Ripley and Send. The existing boundary also absorbs some noise and pollution from the A3 itself.

The proposed industrial development of 7000 sq m is simply not needed since the latest Employment Land Needs
Assessment 2015 shows a reduction of 80% in required employment floorspace from the previous draft plan. Additionally
GBC have not provided any evidence of a requirement for this. Basically this means that industrial space at Burntcommon
is not required. Even if there was a requirement for 7000 sq m of industrial space it should be at Slyfield where there is
already available space.

Furthermore, a new 4 way interchange onto the A3 at Burntcommon to serve this development would be disastrous for
Send. Send Road A247 would become gridlocked all day, as it would be the through route to Woking for traffic leaving the
M25 and A3, the proposed 2000 houses at Wisley and the 2000 houses at Burpham. Send cannot take that amount of
traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/7332  Respondent: 10833025 / M Wright  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a).  
The additional north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.  
The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.  
I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.  
Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

Comment ID: PSLPS16/7333  Respondent: 10833025 / M Wright  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A44 Send Hill.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

I feel contempt for Councillors of G.B.C. who are attempting to force developments that destroy Green Belt land in a cynical move and return the number of houses to far in excess of what is required. There is no need for any more housing on top of the 13,860 already proposed for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create a lot of additional pollution due to traffic.

Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1815    Respondent: 10833025 / M Wright    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have not followed correct procedure. Since 2014 GBC has changed every major site in Send proposed for development and now has added a new massive road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3921    Respondent: 10833089 / J Wright    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore housing numbers from the 2015 (SHMA) are highly questionable.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7318    Respondent: 10833089 / J Wright    Agent:
I object to policy A42 Clockbarn Nursery

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

Conclusion:

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

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Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
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Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

This proposal was never in the regulation 18 draft, and as such has never been consulted on, and was slipped into the Local Plan at the last minute.

This site is green belt comprising of woodland and meadows between the A3 and Send and Ripley. This site has a particular sensitivity since it is covered in ancient woodland, some trees date back to the 16th century.

It is permanently protected by the NPFF which prevents the merging of settlements, there are no exceptional circumstances to develop this land.

To destroy a natural boundary between the A3 and the villages would be incredibly damaging to them. The obvious increase in pollution caused by massive amounts of extra traffic would be hazardous to health of residents young and old of both Ripley and Send. The existing boundary also absorbs some noise and pollution from the A3 itself.

The proposed industrial development of 7000 sq m is simply not needed since the latest Employment Land Needs Assessment 2015 shows a reduction of 80% in required employment floorspace from the previous draft plan. Additionally GBC have not provided any evidence of a requirement for this. Basically this means that industrial space at Burntcommon is not required. Even if there was a requirement for 7000 sq m of industrial space it should be at Slyfield where there is already available space.

Furthermore, a new 4 way interchange onto the A3 at Burntcommon to serve this development would be disastrous for Send. Send Road A247 would become gridlocked all day, as it would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2000 houses at Wisley and the 2000 houses at Burpham. Send cannot take that amount of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

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Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7317  Respondent: 10833089 / J Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 Send Hill.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.
The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

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GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

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I feel contempt for Councillors of G.B.C. who are attempting to force developments that destroy Green Belt land in a cynical move and return the number of houses to far in excess of what is required. There is no need for any more housing on top of the 13,860 already proposed for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16319  Respondent: 10833089 / J Wright  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Any more development in this area would surely constitute urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16320  Respondent: 10833089 / J Wright  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create a lot of additional pollution due to traffic.

Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1811  Respondent: 10833089 / J Wright  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC have not followed correct procedure. Since 2014 GBC has changed every major site in Send proposed for development and now has added a new massive road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/871  Respondent: 10833377 / Cynthia Thorpe  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a long term resident of West Horsley. An extra 385 extra homes in West Horsley, which is an increase of some 35% on existing, without any improvements in infrastructure, will cause huge problems in the area. As it is, existing schools, medical facilities, road an transport systems, together with drainage and sewage systems to name but a few, are struggling to cope with current strains put on them. What is proposed is insupportable and I wish to object.

The proposed extra 385 homes in West, and 100 in East Horsley, are at variance with the key Evidence document "Guildford Borough Economic Strategy 2012-2031." Why? Because it does not argue in favour of locating large numbers of homes in either The Horsleys or neighbouring villages. I object to the proposal for this reason also.

Furthermore, simple arithmetic tells me that such a large number of houses on such relatively small sites will be both out of keeping and of a much higher density that the rest of West Horsley. Please register my complaint on these grounds.

The West Horsley Parish Council & Surrey Community Action Housing Survey:May 2014 indentified a limited need for about 20 affordable homes to enable local people to stay in the village: principally young people and elderly people wishing to downsize. The need for so many houses to be buliy in West Horsley over the initial 5 years of the Plan period 2018-2033 is totally unproven. Again I wish to register an objection.

I am totally opposed to any change in, or 'insetting' of, the Green Belt, so as to permit the proposed developments because no exceptional circumstances have been cited in justification. Again, will you please register my objection. It must be said that if acceptable representations had been made for 'insetting' the Green Belt, then I might take a different view.

You will see from the above that I am totally opposed to the proposal to build an extra 385 homes in West Horsley - and for that matter an extra 100 in East Horsley. Please add my name to the list of objectors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/728  Respondent: 10833409 / Penny Hewitson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
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- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

I write to say yet again how greatly I object to the above Policy which in my view will [illegible word] the whole part of the Hog’s Back, take even more Green Belt land (which was always supposed to be protected throughout the country) reduce further the production of crops on excellent farmland, caused even more traffic congestion and air pollution.

In September 2014 when This project was first suggested, I wrote (and reiterate my comment then) to say The University is surrounded with plenty of land which could provide extensive student accommodation. I see from the report in the Surrey Advertiser of 30/6/17 I was not alone in This suggestion. Also there is other land not yet used, so again use that already available.
As to the Research Park, I suggested they and the do as in other areas – build up or below ground. There is so much space allocated for car parking which could be put to better use if the cars were able to use a carpark underground leaving extensive space to build at least two storey facilities covering the same area.

Regarding the 1800 not affordable housing plan – are these really necessary? Usually the constraint refrain is for affordable housing. If you get approval for this plan and use more of Blackwell Farm how long will it be before another Plan is suggested and the whole farm will be completely concreted over plus where will other “sites” be earmarked for housing and offices/car parking. Nowhere will be safe from proposed “developments” regardless of traffic congestion, air pollution etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4832  Respondent: 10833441 / I Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/110  Respondent: 10833505 / Elizabeth James  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident of Ockham Road South, I must object most strongly to the new local plan;

Why have our villages been removed from the Green Belt, when the objectives of the green belt are to preserve our green and beautiful land from intrusive development?

Has anyone given a thought to the infrastructure of Horsley? The B2039 Ockham Road South was never built for the volume of traffic it is currently sustaining. At certain times of the day I cannot exit my drive without someone stopping to let me out. We regularly pick up wing mirrors (2 to 3 per week) from outside the house. I have been in the hedge twice to avoid vehicles mounting the pavement rather than slow down, and my husband has had the number plate torn off his car whilst in the drive waiting to turn left, by a speeding lorry which had mounted the pavement to avoid slowing down. There are many elderly people and mums with buggies walking up and down - will it take an accident to determine that the roads are currently very dangerous?

Places at local schools are at a premium, the doctors surgery is full, the roads flood regularly.

533 houses equals at least a thousand more people, a thousand more cars and a thousand times more load on our already fragile infrastructure.

Since our local supermarket Budgeons has Sunday opening hours, it cannot therefore be categorised as a large supermarket.

This is a village, first and foremost. It's identity is being superseded by planners who see a gap and attempt to force multiple houses on small areas of land, therefore eroding the very nature of the village.

Whilst we are all aware of the need for more housing - this plan is ill thought out, and intrusive. The scale of these proposals is totally disproportionate to the area and must be reviewed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/1092  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects. The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1809  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, 62215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1803  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1811  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BS).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).
This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1817  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3890  Respondent: 10833537 / AC Vause  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3871  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1).

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common {A43}, would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3881  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3930  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourist attractions. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An
"English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3902</th>
<th>Respondent: 10833537 / AC Vause</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

IOBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brex it projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/3929</th>
<th>Respondent: 10833537 / AC Vause</th>
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I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/3899</th>
<th>Respondent:</th>
<th>10833537 / AC Vause</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk offloading and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3860  Respondent: 10833537 / AC Vause  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3867  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not
apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This
approach differs from all the other Borough Councils in Surrey.
3. The Housing number is based on pre-Brexit data for economic and population growth, including mi These now
need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing
Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should
be an area within which a majority of people live, work, shop or On any common sense view, "West Surrey" is
much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the
borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the
South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the
adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to
say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say)
Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more
complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public
consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however,
does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open
countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared
with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This
distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the
borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill
(Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being
located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only
about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated
between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the
surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the
borough.
The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/319  **Respondent:** 10833537 / AC Vause  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am a resident of the village of West Clandon and I wish to object to the following elements of the 2017 Local Plan policies having an impact on the A247 - my objections are-

The following proposals will have an impact on the traffic on the A247, much of which will be lorries and vans:-

1. Gosden Hill Development and off and on slip roads to service the development.
2. The proposed 4 form entry secondry school etc.
3. Potential employees on the employment site to the north side of Gosden Hill Farm
4. Garlick's Arch Development
5. Burnt Common on/off slip roads
6. Burnt Common industrial Site Development
7. Slyfield Development
8. Wisley Development
9. Smaller house developments in West Horsley, Send and Ripley
10. The SCC business plan for Newlands Corner

The A 247 although an A road:-

1. Is less than 2 vehicles wide in places, lorries have to mount the pavement to pass
2. Does not have continuous footpaths or street lights
3. Has several sharp bends
4. Has a humpback bridge with poor site lines
5. Has a primary school
6 Is already congested at times, more so when delays on the A3 are severe, commonly between 4 and 6.30pm
7 It cuts through the Conservation Area of West Clandon within which 19 listed buildings are located with road frontage

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3567  Respondent: 10833569 / Gary Parkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for the following reasons:

1. Keens Lane is a narrow lane and has been so for decades, over which more and more houses have been snuck into the area feeding off of the narrow lane. Building more properties there without widening of the road does not seem logical and any widening and increased traffic would then severely impact on the interlinking, of Gravetts Lane and Tangle Lane.

2. The area is Green Belt, which should be retained and not built on, but then you know this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1147  Respondent: 10834081 / Stephen Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems to me that some official in the planning department drew lines around possible open spaces and brown field sites on a CAD map. The official missed out the large commercial sites such as in Walnut Tree Close opposite Dapdune Wharf. With the downturn in commercial rents caused by Brexit, this is likely to remain empty like other site in North Street which look like a bomb site. Well done Guildford Borough Council. Leave the centre of Guildford derelict!
There has been no consideration to the disruption and cost of reinforcing the potable water, waste water, gas, electricity, drainage and communication networks to supply the new properties. Also there are no results of impact studies carried on the effects on increased traffic flows. For example 1100 houses in Flexford. In the mornings the whole area goes into gridlock already because of existing extra housing. What is the impact of another 1100 cars? Where do the 4 wheel drive cars from the new estates in Ripley and Wisley go at 8 am?

Have any of the executive team ever walked around Guildford on a Friday evening and see York Road, Stoke Road, Woodbridge Road at a standstill. Probably not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/378  Respondent: 10834081 / Stephen Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Don't agree

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/379  Respondent: 10834081 / Stephen Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I doubt whether tis is legal after the resignation suddenly of the Head of Planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I am afraid I do not trust the and the executive</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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| We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which: | | | | | • disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]  
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas  
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]  
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** | | | | | Attached documents: |

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GBC LOCAL PLAN

I wish to make the following comments;

I object to Effingham being taken out of the Green Belt.

However, if this has to be the case, the boundary proposed in the centre of the village is very weak and a better boundary would be Church Lane and thus keeping Lower Road and the Howard of Effingham School in the Green Belt.

I attach a map showing my proposed changes.

I trust that you will take my comments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LP2016 - James Brennan.pdf (169 KB)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Whilst there seems to be broad agreement for the Guildford 'demographic' OAN arrived at by the 2015 SHMA, the increase to this figure to support economic expansion, improved affordability and additional student housing has been vigorously disputed. There is credible analysis questioning the validity of this 'uplift'. As the SHMA is such a key part of the evidence base underpinning the plan some attempt should be made to resolve the differing views prior to submission, rather than just hiding behind an excuse of commercial sensitivity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Local Plan proposed for Send, Send Marsh and the surrounding area on the following grounds:

I object to the proposal to build 45 houses at Clockham Nursery, on Tannery Lane. There are already 64 houses planned for the area, plus the development of a marina, on a narrow, single track country road which cannot take the traffic. The planned building of these houses is already too much for this site (which also consistently floods) so adding 45 more houses would be disastrous.

I object to the development at Garlick's Arch for 400 houses and 7000 square metres of industrial space. The A3 is already at a very high capacity; the additional traffic from the houses and an industrial site would lead to severe congestion, nearing (or even reaching) gridlock. I also object to the industrial space on the grounds that the Employment Land Needs Assessment 2015 (ELNA) shows a reduction in required employment floor space from the previous draft plan of 80%, so it is simply not needed.

I object to all the proposed sites in Send because they were not included in the previous consultation of 2014. Send and Send Marsh have not been properly consulted on the current sites, especially Garlick's Arch and a new, 4-way A3 junction, which were pushed through at the last minute, not having previously been proposed and consulted on with local residents and businesses.

I object to the 4-way A3 junction at Burnt Common, as Send simply cannot cope with the additional traffic it would bring. Anyone who knows Send village is all too aware of the extreme traffic congestion, especially in the morning and evening rush hours. Traffic already tails back into Woking as traffic travels to and from the A3; the dangers of both gridlock and increased risk of traffic accidents really cannot be overstated.

I object to Send being removed from the Green Belt (Policy P2). The Green Belt land around Send and Send Marsh act as a buffer between Woking and Guildford. This is one of the tenets of The National Planning Policy Framework, namely point 80, which states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. It is vital to keep this buffer in place, not only for the local community, but because of the great natural beauty of the area.

I object to the proposals for the development of 40 houses and 2 traveller's pitches at Send Hill (Policy A44 . 1.9 ha). There is only a single track road, which already suffers from heavy traffic; it would be a grave mistake to add to this strain with the additional traffic the development would create.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. Not only will this result in large areas of Green Belt being destroyed, but it will also add to the heavy traffic congestion on the A3, especially at the junction with the M25 and through Ripley, Send and Send Marsh, which are already under immense pressure from the volume of traffic travelling through and around these areas.

I object to the Local Plan based on the fact that the infrastructure of Send and Send Marsh is wholly inadequate, and cannot cope with the increase volume of traffic and population. Our schools, nursery and The Villages surgery are under immense pressure already, and could not cope with such a proposed increase in population. The road system would also be unable to take the increased volume, with the very real risk of not only gridlock, but increased risk of accidents to drivers, cyclists and pedestrians (including children at Send Primary and St Bede's schools). However, any further development of the road system would destroy the Send Marsh and Send village, which act as the essential buffer between Woking and Guildford. The plan is entirely unsuited to the area, and so I urge you to abandon it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. Not only will this result in large areas of Green Belt being destroyed, but it will also add to the heavy traffic congestion on the A3, especially at the junction with the M25 and through Ripley, Send and Send Marsh, which are already under immense pressure from the volume of traffic travelling through and around these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal to build 45 houses at Clockbarn Nursery, on Tannery Lane. There are already 64 houses planned for the area, plus the development of a marina, on a narrow, single track country road which cannot take the traffic. The planned building of these houses is already too much for this site (which also consistently floods) so adding 45 more houses would be disastrous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development at Garlick’s Arch for 400 houses and 7000 square metres of industrial space. The A3 is already at a very high capacity; the additional traffic from the houses and an industrial site would lead to severe congestion, nearing (or even reaching) gridlock. I also object to the industrial space on the grounds that the Employment Land Needs Assessment 2015 (ELNA) shows a reduction in required employment floor space from the previous draft plan of 80%, so it is simply not needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5818  **Respondent:** 10835617 / Glenis Pycraft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I object to the 4-way A3 junction at Burnt Common, as Send simply cannot cope with the additional traffic it would bring. Anyone who knows Send village is all too aware of the extreme traffic congestion, especially in the morning and evening rush hours. Traffic already tails back into Woking as traffic travels to and from the A3; the dangers of both gridlock and increased risk of traffic accidents really cannot be overstated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5819  **Respondent:** 10835617 / Glenis Pycraft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I object to the proposals for the development of 40 houses and 2 traveller’s pitches at Send Hill (Policy A44. 1.9 ha). There is only a single track road, which already suffers from heavy traffic; it would be a grave mistake to add to this strain with the additional traffic the development would create.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11851  **Respondent:** 10835617 / Glenis Pycraft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan based on the fact that the infrastructure of Send and Send Marsh is wholly inadequate, and cannot cope with the increase volume of traffic and population. Our schools, nursery and The Villages surgery are under immense pressure already, and could not cope with such a proposed increase in population. The road system would also be unable to take the increased volume, with the very real risk of not only gridlock, but increased risk of accidents to drivers, cyclists and pedestrians (including children at Send Primary and St Bede’s schools). However, any further development of the road system would destroy the Send Marsh and Send village, which act as the essential buffer between Woking and Guildford. The plan is entirely unsuited to the area, and so I urge you to abandon it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11850  Respondent: 10835617 / Glenis Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt (Policy P2). The Green Belt land around Send and Send Marsh act as a buffer between Woking and Guildford. This is one of the tenets of The National Planning Policy Framework, namely point 80, which states that one of the purposes of Green Belt land is ‘to prevent neighbouring towns merging into one another’. It is vital to keep this buffer in place, not only for the local community, but because of the great natural beauty of the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1409  Respondent: 10835617 / Glenis Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all the proposed sites in Send because they were not included in the previous consultation of 2014. Send and Send Marsh have not been properly consulted on the current sites, especially Garlick’s Arch and a new, 4-way A3 junction, which were pushed through at the last minute, not having previously been proposed and consulted on with local residents and businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3203  **Respondent:** 10835937 / P.A. Robertson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I wish to inform you that I **strongly object to A46 in Normandy** in the June 2016 Draft Local Plan.

Residents have the right to decide where they choose to live.

I chose to live in a semi-rural environment and not in a suburban area. Normandy and Flexford's 'needs and priorities have not been decided by residents.' This developer-led plan is forcing urbanisation into a totally unsuitable environment.

A village needs to change and develop slowly and gradually over time. Normandy is changing as small pockets of infilling and development on brownfield sites have occurred. Young families are moving in and the age balance is good. There is already a lively community area especially using the Manor Fruit Farm facilities and Normandy Common.

**The Local Plan for A46 is totally out of proportion to the current size of Normandy.**

It is forcing Normandy and Flexford to become a 'town' divided only by a railway line. Development is not needed to supply village needs. There are still empty houses on the new builds in Tongham showing there is no need for further housebuilding.

Shops and pubs have closed in Normandy as they were underused. Shopping habits are changing nationally. If a 'local' shop was thought viable one of the big four supermarkets would have jumped at the opportunity of the vacant station property with small adjoining car park.

I am shocked that the Planning Department are so weak to think of using Normandy as a scapegoat as one big development saves planning department's time and hassle of a number of smaller developments using brownfield sites.

The Green Belt's purpose is to prevent urban areas sprawling by keeping green, living, breathing spaces open. These spaces are to keep us all physically and mentally well. To remove Green Belt to pacify a developer's greed is WRONG. If a developer choses an area they think will maximise profit, this does **not** count as 'Exceptional Circumstances.'

There is currently no need for a secondary school as there are sufficient spaces available for the 30 children moving on from Wyke Primary School each year. Such a school would only be needed if the development was forced through. As there is no need children would be 'dragged in' from other areas by car causing further problems on the dangerous, narrow, crowded roads. These 'dragged' children would cause the neighbouring local schools to become further undersubscribed. Any idea of children all coming by train is unrealistic. The platform at Wanborough is only 4 carriages long. Plans to bus
children to school are not feasible as it would need dozens of single decker buses as the railway arch in Westwood Lane is too low to accommodate double decker buses.

Environmentally the village lanes are narrow and twisty with very poor sight lines. Glaziers Lane (D60) has only partial pavements. I am forced to cross Glaziers Lane multiple times to simply attend Emmanuel Church in Glaziers Lane. During the week I walk my 4 grandsons to and from Nursery in Glaziers Lane. Every crossing of Glaziers Lane becomes a nightmare. Occasionally a car will stop to let us cross but this is so dangerous. A few years ago there was a fatal accident at the very place I am forced to cross over the lane as the pavement ends immediately at a sharp blind bend. This unbelievably is one of the so called access points to A46! How many people will have their lives at risk or die if this development goes ahead.

No more traffic can be pushed onto Glaziers Lane (D60) or Westwood Lane (C16). The latest development at Beech Lane (off Westwood lane) immediately adjacent to the narrow, single lane, low railway arch which is also skewed; so very poor sightline visibility is causing many near accidents with the increasing number of vehicles cutting through the village to and from the A31 Hogs Back up a narrow village lane.

Every time there is a problem on the A31 Hogs back or elsewhere traffic is forced down through the village causing snarl ups and fumes. Any traffic problem in Guildford or at the A323 Ash railway crossing causes the A323 Aldershot Road to grind to a halt. Any more enforced traffic would result in total gridlock. Asthmatics suffer dreadfully from traffic fumes.

Both D60 and C16 have narrow, dangerous, broken and filthy pavements. Glaziers Lane cannot cope with surface water drainage after the slightest rainfall water bursts out of manholes and drains which means I have to walk in the lane to dodge torrents of water and mud whilst pushing a pram. The station entrance regularly floods and pedestrians cannot access the station platforms and have to be driven through the water to the platform entrance. This problem was exacerbated by the 2 lots of infilling development along Station Road. Station Road is a right angled bend immediately at the bottom of a blind hump back bridge. This access is totally unsafe for children to access the 'so called' safe cycle path (Christmas Pie Trail) or dash to hundreds of parent's cars which would be parked on every available space around the village. School Lane cannot cope with the traffic from a one form entry Primary School. The idea of an 8 form entry Secondary School is ludicrous.

The traffic chaos in the whole Guildford area needs to be fully addressed or the resulting deaths from respiratory problems and road accidents will cause Guildford and the surrounding villages untold harm.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am staggered and outraged with the proposals and I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1446  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site and is therefore unfit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4024  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site and is therefore unfit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1447  Respondent: 10836033 / Katherine Gervasio  Agent:
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough because it is too high.

The Plan’s proposed growth is based on the SHMA report which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans. However, the Council will not publish the SHMA report so how do we know if this figure is commensurate with demand or not? This lack of transparency is unacceptable for consultation on the Plan!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

Garlick’s Arch is protected from development as Green Belt. Central Government states clearly that housing need is not an exceptional circumstance and, therefore, there are no exceptional circumstances which allow for the removal of Garlick’s Arch from the Green Belt (Policy P2). The Plan states that Brownfield Site should be used in preference and yet Guildford Borough Council have removed the Burnt Common proposal and replaced it with Green Belt land at Garlick’s Arch. There are other reasons that this site is unsuitable which have already been mentioned such as frequent flooding, lack of transport infrastructure, the site of ancient woodland with accompanying wildlife habitat and the lack of schools and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2610  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been there for decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7495  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. Central Government states clearly that housing need is not an exceptional circumstance and, therefore, there are no exceptional circumstances which allow for the removal of Garlick’s Arch from the Green Belt (Policy P2). The Plan states that Brownfield Site should be used in preference and yet Guildford Borough Council have removed the Burnt Common proposal and replaced it with Green Belt land at Garlick’s Arch. There are other reasons that this site is unsuitable which have already been mentioned such as frequent flooding, lack of transport infrastructure, the site of ancient woodland with accompanying wildlife habitat and the lack of schools and medical facilities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2605  
Respondent: 10836033 / Katherine Gervasio  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common

If this plan goes ahead, all the traffic from London/M25 to Woking and back will go through Burnt Common, Send and Old Woking. The proposed extra development in the area will compound this problem. The roads cannot take this sort of traffic, they struggle with current traffic levels. Neither can they be improved/widened because they run through villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7494  
Respondent: 10836033 / Katherine Gervasio  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

If this plan goes ahead, all the traffic from London/M25 to Woking and back will go through Burnt Common, Send and Old Woking. The proposed extra development in the area will compound this problem. The roads cannot take this sort of traffic, they struggle with current traffic levels. Neither can they be improved/widened because they run through villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5823  
Respondent: 10836033 / Katherine Gervasio  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I object to the damage to the historic environment as a result of the scale of the proposed development

Garlick’s Arch (A43) is proposed to have development that would double the built up area in this locality and include business units which are more than likely to attract heavy goods vehicles and this would inevitably damage the character of the Ancient Woodland which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the employment strategy and impact at Garlick’s Arch (A43)**

There is no need for new industrial sites on Green Belt at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16680 **Respondent:** 10836033 / Katherine Gervasio **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2)**

There is no need for new industrial sites on Green Belt at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5818 **Respondent:** 10836033 / Katherine Gervasio **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object to there being a lack of proper infrastructure planning for sites (Policy 11)**

The Local Plan does not include adequate infrastructure improvements to accommodate such a massive development. The area is already overloaded and there is no thought for police/emergency services provision for the extra 5000 + houses planned in the Local Plan in the north-east of the Borough.

At Garlick’s Arch (A43) for instance, local services, sewerage, utilities, doctors and schools are already at full capacity but there is no infrastructure projects envisaged in the Plan so the development is untenable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure**

There is no plan to improve the main roads in Send, Clandon and Ripley which are already overly congested. As for the smaller, rural roads - these are often narrow or single track, in poor condition with no pedestrian provision. In rush hour these roads are used as alternatives. Any more traffic (from large housing developments) would be dangerous and unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

2. **I object to there being a lack of proper infrastructure planning for sites (Policy 11)**

The Local Plan does not include adequate infrastructure improvements to accommodate such a massive development. The area is already overloaded and there is no thought for police/emergency services provision for the extra 5000 + houses planned in the Local Plan in the north-east of the Borough.

At Garlick’s Arch (A43) for instance, local services, sewerage, utilities, doctors and schools are already at full capacity but there is no infrastructure projects envisaged in the Plan so the development is untenable.

**I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)**
There is no plan to improve the main roads in Send, Clandon and Ripley which are already overly congested. As for the smaller, rural roads - these are often narrow or single track, in poor condition with no pedestrian provision. In rush hour these roads are used as alternatives. Any more traffic (from large housing developments) would be dangerous and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5829  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly, I object due to the congestion that will be caused to the trunk roads, A3/M25 by the development

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16683  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly, I object due to the congestion that will be caused to the trunk roads, A3/M25 by the development (Policy 12)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the time frame of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/16679</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
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1. **I object because of poor air quality concerns**

Because of the massive developments being proposed, particularly in the north east of the borough, there will be much greater congestion on the roads which in turn will lead to poorer air quality. This will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/16682</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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**I object because of poor air quality concerns (Policy I3)**

Because of the massive developments being proposed, particularly in the north east of the borough, there will be much greater congestion on the roads which in turn will lead to poorer air quality. This will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been there for decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4. I object that Green Belt is being removed from its Protection.

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). This will result in urban sprawl which is exactly why it was designated Green Belt in the first place. The cavalier approach of this Local Plan to summarily remove the Green Belt because it does not suit is, at best, convenient, and, at worst, criminal. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. Why cannot the plan develop the existing brownfield site at Burnt Common, originally in the Draft, rather than developing Garlick’s Arch (A43)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to development in areas which are at risk of flooding**

The Garlick’s Arch Site (A43) is classified as a higher risk of flooding by the Environment Agency in the Council’s own assessment. This area has flooded many times in recent years so should not be included in the development. This Plan does not take adequate account of flood risk as required by National Planning Policy. It will mean misery for those who buy houses on this site!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the Local Plan for the unsustainability of the development proposed (Policy S1)

The proposed number of houses for the Borough will damage local communities, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services. This means that people who buy houses here will have to rely on cars which will clog the whole area. Why not target urban areas, with good public services, for more development rather than small villages whose characters will change as a result of over-development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the Borough Wide Strategy**

In my opinion the Plan is unbalanced: 36% of all the Plan’s new housing is proposed in the north-east area of Guildford: (Wisley [A35], Ripley/Send [A43] and Clandon [A25]) where there is currently only 11% of the current housing. A staggering amount of housing: 5,036 new homes are proposed on the 5 mile stretch between the M25 and Burpham. This will result in a merging urbanisation of these villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/16678</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</strong></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

2. **I object to the Borough Wide Strategy (Policy S2)**

In my opinion the Plan is unbalanced: 36% of all the Plan’s new housing is proposed in the north-east area of Guildford: (Wisley [A35], Ripley/Send [A43] and Clandon [A25]) where there is currently only 11% of the current housing. A staggering amount of housing: 5,036 new homes are proposed on the 5 mile stretch between the M25 and Burpham. This will result in a merging urbanisation of these villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: pslp172/1002</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</strong></td>
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</table>

3. **I object to the fact that Brownfield sites A4 and A34 have been removed from the Local Plan which puts pressure onto Green Belt sites to meet the so-called housing “need”. Surely it would be better to build on Brownfield sites rather than Green Belt?!**

I wish these objections to be fully taken into consideration, forwarded to the Planning Inspectorate and the Plan amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: pslp172/1001   Respondent: 10836033 / Katherine Gervasio   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send. It will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/998   Respondent: 10836033 / Katherine Gervasio   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2017)

I am objecting to the Guildford Borough Proposed Submission Local Plan (June 2017) and the changes around Ripley and Send, which have increased development so that this Plan is even worse than the 2016 proposals.

I object to the increased A43 Garlicks Arch development. It is Green Belt land and has no identified or exceptional need with the Local Plan Documentation.

I object to the proposed 6 Travelling Showpeople plots. There is no need for this many and the designated formula is for 1500-1999 home on the same site. There are 400 houses proposed on the site so 6 is too many for the amount of houses.
I object to this many Traveller plots in the Ripley/Send area. In Section 4.2.22 of the Plan it states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople.” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.

I object to the change in wording and likely consequences on ‘Affordable Homes’. In the 2016 version of the Plan (Policy 4.2.23) it stated that Developers will be expected to provide land for affordable homes at nil value. Now it just says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” Developers can just pay money to the Council to avoid including affordable homes. This is disgraceful!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/999  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Site A46 (1100 houses) from the Proposed Plan as it creates an unfair burden on the North East of the Borough, leading to over 40% of development happening in a small area of the Green Belt, all within just 3 miles of Send Marsh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1000  Respondent: 10836033 / Katherine Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the substantial increase in industrial floor space at Site A58 Burnt Common from 7000sq metres to an unspecified amount. This does not give local residents enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

I object to the potential for a Waste Management Facility at Site A58 Burnt Common. It is obscurely mentioned in policy 4.423a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/2225  Respondent: 10836097 / B.V. Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO NEW DEVELOPMENT SITE AT GARLICKS ARCH NOT INCLUDED IN REG.18 DRAFT, PERMANENTLY PROTECTED AS GREEN BELT BY NPPF PUBLIC CONSERVATION OF ANCIENT C16 WOODLAND. WOULD SUGGEST IF 7000sqm INDUSTRIAL SPACE IS NEEDED BUILD IT ON THE BROWNFIELD SITE AT SLYFIELD

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2226  Respondent: 10836097 / B.V. Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY A44, 1 SITE WEST OF WINDS RIDGE & SEND HILL TO BUILD 40 HOUSES & 2 TRAVELLERS PITCHES ON SITE CONTAINING DOCUMENTED UNSAFE LANDFILL WASTE & WITH INEFFICIENT ACCESS FROM SINGLE TRACK ROAD

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4826  Respondent: 10836097 / B.V. Dabbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
<table>
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<th>Comment ID: PSLP16/4806</th>
<th>Respondent: 10836097 / B.V. Dabbs</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO NO CASE FOR DISABILITY CARE OR AFFORDABLE HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4802</th>
<th>Respondent: 10836097 / B.V. Dabbs</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO NO CONFIRMATION FOR ALLEGED HOUSING NEED NOS. I OBJECT TO LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS

I OBJECT TO NO IMMEDIATE PROVISION FOR DOCTORS SURGERIES

I OBJECT TO THE LACK OF ALL INFRASTRUCTURE BEFORE HOUSING & INDUSTRIAL DEVELOPMENT

I OBJECT TO THE ADDED IMPACT ON EXISTING ROADS LINKING: SEND -OLD WOKING,BURNT COMMON -RIPLEY, RIPLEY -E.CLANDON,A3-M25

I OBJECT TO PRIORITISING GREEN BELT DEVELOPMENT OVER BROWNFIELD WHICH COULD SUPPORT 50% BUILDING

I OBJECT TO INCORRECT HANDLING OF DEVELOPMENT THROUGH REGULATION 19 INSTEAD OF REGULATION 18

I OBJECT TO FURTHER INDUSTRIAL SPACE AT BURNT COMMON AFTER THE 80% REDUCTION IN EMPLOYMENT SPACE IN 2013

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO ALL EROSION OF THE GREEN BELT
I OBJECT TO THE REMOVAL OF ANY VILLAGES FROM THE GREEN BELT
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/710  Respondent: 10836161 / Philip Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Guildford Borough Council's Final Draft Local Plan

I am writing to show my objection to your plans for development in Send and the surrounding area and would like my views to be seen by the Planning Inspector.

The amount and scale of proposed development in a village such as Send is beyond a level that is reasonable. The number of proposed new houses has been increased from the number last objected to, up to 485. Surely this warrants another consultation!

Send is within the Green Belt, which in itself should preclude any development that is not reasonable and in keeping with the identity of the village. The village of Send does not have the space or resources to accommodate the infrastructure that is needed to cope with the development which includes an increase in housing, and a development to build 485 houses and an area of industrial, storage and distribution space at Garlick's Arch.

This area can specifically not handle the additional traffic that will be developed if a new interchange on the A3 is built and the roads will be gridlocked all day and night.
The scale of the proposed development will destroy the Green Belt and the rural identity of the village and lead Send to become a concreted "suburb" of Woking or Guildford and lose its Green Belt status. Some of the development is on or near to land that regularly floods and therefore not practical.

We will also lose beautiful, green spaces in which to play and walk and which are of benefit to all. Send is a "buffer" between Woking and Guildford and should retain its Green Belt status and not have unnecessary and unsympathetic development within its boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1102  Respondent: 10836161 / Philip Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Further, the specific proposal for a traveller's pitch has also not been consulted on previously and in addition the roads that will be needed to access this site together with the proposed sites for development at Winds Ridge and Send Hill, designated for 40 homes and 2 travellers pitches, are narrow, hedge lined lanes that are not suitable to accommodate the size of road required to manage the additional traffic that will pass along their route.

I trust that you will reconsider the totally inappropriate plans which are objected to by the residents of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

Comment ID: pslp172/4241  Respondent: 10836513 / Neil Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 - Land at Wisley Airfield. (Three Farm Meadows). The continued retention of this land in the Local Plan for the planned building of massive housing estates total over 2000 houses is completely unacceptable. Not only will the small village feel of the areas be completely lost but the areas simply cannot take that volume of new housing all at once. There is not the infrastructure nor the amenities in the areas to be able to handle this volume increase. As a Daily commuter who uses the A3 on a daily basis the roads are already not able to cope with the existing traffic any further
increase in volume would be completely unacceptable. The changes in the revised plan are only small and make no effort to address the real issues at stake here regarding the impact on the local communities and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to send an objection to development of land at Keens Lane for 140 homes, Site A.22 in the Local Plan.

1. The site should not be developed as it forms part of the Green Belt protected zone surrounding Guildford.

2. Keens Lane is a very narrow lane, bordered on the one side by housing and common land, and on the other by tall hedges. In places it is impossible for two vehicles to pass each other. Tangley Lane, into which Keens Lane feeds, and which forms part of the boundary of the development, is equally narrow, and has a particularly hazardous blind 90 degree corner. Both lanes are unsuitable for further traffic.

3. Whitmoor Common SPA is adjacent to the corner of the proposed development, and with the nearby Broad Street Common SNCI, further housing development would create unacceptable stress on these unique protected habitats, and the wildlife corridor between them.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/1795</th>
<th>Respondent: 10836641 / Peter Wilkinson</th>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3204</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A secondary school at site A46 is not needed

There are a very large number (many hundreds) of vacant secondary school places in local schools (undersubscribed), all of which have space for expansion and a willingness from them to increase admission numbers by expanding if there was demand. The nearest secondary school, Ash Manor, is only 3 miles from the A46 site. There is no requirement for a new secondary school in Normandy.
There are NO EXCEPTIONAL CIRCUMSTANCES to take site A46 at Normandy out of the Green Belt. As already stated there is no need to build a secondary school at site A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7065  Respondent: 10837089 / R. Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Infrastructure of Normandy cannot support the development of site A46.

Highways

Site A46 is bounded by Glaziers Lane (060) and Westward Lane (C16). Both of these are 'Lanes' by definition- not roads. Lane is defined as a narrow way or road. In particular Glaziers Lane is unclassified. It is narrow with blind bends with a steep blind hump back bridge (over a railway line) at skewed angle. In the main there is only a foot path on one side of the lane but this changes from one side to the other and back again at the most dangerous positions possible - one by a sharp blind bend with no sight lines forcing people to cross actually on the bend and hope no vehicles are coming as the sight line doesn't materialise until you are halfway across the lane (the site of a fatal road accident some years ago). The other at the base of the hump back bridge where there is no sight line of oncoming vehicles due to the blind summit. Because of the narrowness of much of the footpath it is difficult to push a pram along without having at times to go into the road. Neither Glaziers Lane nor Westwood Lane were designed for the volume of traffic they currently take, let alone a massive increase that would be generated by developing A46.

Westward Lane has a very narrow railway arch under which the lane passes. This is only one lane wide and is skewed with poor sightline visibility. This also has a height restriction preventing larger vehicles such as buses and lorries from using.

Although unsuitable, both Glaziers Lane and Westward Lane take traffic between A31 Hogs Back and A323 Aldershot/Guildford Road particularly at peak times. Whenever there are traffic problems on A31 or A323, (with increasing frequency), traffic diverts through Normandy causing traffic chaos.

The proposed development of site A46 would create a massive increase in vehicle movements on a daily basis throughout the day. The vehicle movements and parking of parent' cars because of the very large school would be massive and should not be underestimated. Traffic chaos would prevail and also the problems caused by hundreds of parked cars due to parents taking and collecting children at the school.

Most children would not be able to come by rail (the station platforms are only long enough for 4 carriages) and these are usually full of passengers in the mornings and evenings. It would not be safe or possible to bus hundreds of children in and out of school each day either - the number of coaches required on these narrow busy roads would be dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7053  Respondent: 10837089 / R. Robertson  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

Site A46 at Normandy has been designated as RED ZONE sensitive area by GBC, where development should **not** take place and should remain in the Green Belt.

The proposed development of site A46 would completely urbanise the semi-rural village of Normandy, destroying the open space. It would more than double the number of houses plus all the additions of commercial and other buildings and also the enormity of a very large secondary school - replacing grass with concrete. The whole purpose of Green Belt land is to provide a buffer from increased urbanisation, to provide a living, breathing 'green space'.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

*Surface water/ Flood risk*

Surface water problems are evident over the whole of the Normandy area with standing and often flowing water from drains into the roads and adjacent land in heavy rain. The drainage system at present is at capacity and there is absolutely no doubt that the proposed development of A46 would be catastrophic for surface water in Normandy and nowhere for the water to go when it rains, let alone the volumes of water generated by the development. Even part of the A46 site which adjoins a stream is a flood plain when the stream overflows. What will happen when this land is built on?

Where will the excess water go? Where will the water from the development go? It will cause serious flooding in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPA16/357  **Respondent:** 10837217 / Gillian Dobb-Ponds  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the number of houses that are proposed to be built in East and West Horsley, also the 2,000 houses that are proposed at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1053  Respondent: 10837217 / Gillian Dobb-Ponds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am strongly object to the change in the Green Belt the villages will end up joining up to each other. We will end up [text unreadable] Ewell, Epsom.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1055  Respondent: 10837217 / Gillian Dobb-Ponds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No affordable houses have been built in West Horsley the builders only want to build 4/5 bedroom they make much bigger profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1052  Respondent: 10837217 / Gillian Dobb-Ponds  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads around this area are crowded enough also car parking at stations are full. The M25 is grid locked at least once a week, I drive over it going to Cobham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

Comment ID: PSLPP16/1054  Respondent: 10837217 / Gillian Dobb-Ponds  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If the occupants of all these new houses want work in London the underground will be chaos and accidents will take place. Houses should be built in the Midlands and up north. The government should encourage firms to move out of London. There are many unemployed up north and houses are much cheaper.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:

Comment ID: PSLPA16/1736  Respondent: 10837313 / Mary Jane Gray  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of clarity given with respect to the derivation of the housing requirement figures that appear to have been based on an exaggerated housing need which has resulted in increased numbers that can only be satisfied by building on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/3391  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site proposed under PolicyA42a. Planning permission has already been granted for development of a marina and 64 apartments on the adjacent site, any additional development on Tannery lane will create further safety issues with respect to the traffic loads on this narrow road and its junction with Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3378  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site proposed under PolicyA43 which is one of the last minute additions to the GBC Plan. Development of Garlick's Arch will destroy ancient woodland and Green Belt land. The requirement for a further 400 homes must be justified along with the need for 7000sq m of industrial space when the Slyfield site would seem to have the necessary acreage available for this purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3381  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
I object to the development proposed under Policy A43A. Construction of a new interchange onto the A3 at Burnt Common will impose an intolerable burden on the A247 through Send and West Clandon as this road will now become a primary feeder to the A3 and hence the M25. The existing roads though these villages cannot be widened or upgraded and are already overloaded at peak times so any further increase in traffic flows will produce a gridlock situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the site proposed under Policy 44. This is another new site that was not included in the Regulation 18 draft document. As well as being Green Belt land this site has been the subject of extensive landfill activities that need to be fully researched before it can even be considered for development. I believe that the inclusion of 2 No. Travellers Pitches at this site is wholly inappropriate for both the travellers and the existing community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In general I object to the apparent failure of the GBC to firstly identify all available brownfield sites within the urban area for development and the continued support of the GBC for proposals that destroy Green Belt and open countryside particularly along the A3 corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1133  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the way that a number of changes and additional sites have been included in the latest GBC local Plan for Send to the previous version put forward in 2014. These are significant changes and require the full consultation process to be effected not the shortcut procedure under Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/883  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed changes under Policy A42 of the Plan to increase the number of homes at Clockbarn Nursery to 60. This proposal takes no account of the many objections raised previously regarding the development of this site with respect to traffic along Tannery lane and its junction with Send Road, drainage and erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed changes under Policy A43 of the Plan for 400 homes and 6 Travelling Showpeople Plots at Garlick's Arch. Once again this proposal ignores all previous concerns with respect to the development of this site in respect of loss of Green Belt, traffic congestion, drainage, lead pollution and the destruction of ancient woodland. It would also seem to be totally as much as anything else to locate Travelling Showpeople on a residential development such as that being proposed.[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposed changes under Policy A58 of the Plan for a new minimum allocation of 7000m² of Industrial and Warehousing on land at Burnt Common. Development of this area was deleted from the 2014 draft of the Local Plan due to the number of objections received and I can see no justification for its reintroduction in this Plan. GBC are implored to exhaust the development of all existing available industrial sites within the Borough before introducing new sites within Green Belt areas that are to the detriment of the community as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed removal of Send Business Park from the Green Belt under Policy 2 (paragraph 4.3.25) of the Plan. I believe that this policy is will result in yet further commercial development at this site and takes no account of the poor vehicular access in both directions along Tannery Lane or the position of the site in open countryside adjacent to the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/2014</th>
<th>Respondent: 10837665 / J.H. Lakeman</th>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the local plan proposed, and express my worries about the assault on the countryside and Sends local environment. Policy P2 removal of villages from the green belt is very worrying and I object most strongly as it sends the opposite message to your statement in the "About Guildford" publication- "One of the boroughs biggest assets is our significant Green Belt and major consideration is given to protect this".

I strongly object to Policy A43, Garlick's Arch with its proposed A3 junction, 400 houses and a large area of Industrial and warehousing 1000 sq metres. This would really impact on all aspects of Send's life. The A247 is already at a stand still morning and evening during the week and when there is an accident on the A3. It would also make a huge impact on the schools and medical centre. This site has been sprung on us as is on Green Belt protection through NPPF and also it was not included in the regulation 18 draft.

I also object to Policy A44, which again was not included in the regulation 18 draft which is in permanent Green Belt status it contains unsafe landfill waste and is only accessed by a narrow single track country road and Send cemetry is close by, it would disturb the peace and quiet we would hope to keep.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/4119</th>
<th>Respondent: 10837665 / J.H. Lakeman</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to Policy A43, Garlicks Arch, with its proposed A3 junction, 400 houses and a large area of industrial and warehousing 7000sq metres. This would significantly impact all aspects of Send’s life – the A247 is gridlocked at both ends of the working day and whenever the A3 has an accident the local schools and medical centre would be overlooked, this site is new and is on Green Belt protection through NPPF, lastly it was not included in the regulation 18 draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4122  Respondent: 10837665 / J.H. Lakeman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I enclose a cutting from the before mentioned “About Guildford” publication, in particular the paragraphs leaded “your questions about the local plan answered”

“questions. Will there be developments along the A3 from J10 of M25 to beyond the Hogs back?

Answer NO

It then proceeds to explain that in fact there will be some developments.

The paragraph alongside it to the right states “the plan rejects any schemes that would have a detrimental effect on the green belt.

I submit that policy A43. Garlicks Arch proposal cannot be considered to be anything other than detrimental to the green belt.

Such comments in print from “Guildford Borough Council” are in my opinion designed to confuse folks who are very worried over the prospects of the potential disruption of the status quo and all we hold dear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4121  Respondent: 10837665 / J.H. Lakeman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to Policy A44, which again was not included in the regulation 18 draft and is within permanent Green Belt status plus it contains unsafe landfill waste and further is only accessed by a narrow single track country road and it is close to a cemetery where a quiet and peaceful environment is preferable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8636  Respondent: 10837665 / J.H. Lakeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to object to the proposed local plan and to express my concerns at the never ending assault on the countryside and Send's local environment. Policy P2 removal of villages from the Green Belt is particularly disturbing and I object most strenuously as it it sends the opposite message to your statement in the recent "about Guildford" publication- “One of the boroughs biggest assets is our significant green belt and major consideration is given to protecting this”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2375  Respondent: 10837665 / J.H. Lakeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the policy A42 change a Clockbarn on Tannery Lane because; you have ignored the many objections raised previously by local residents by increasing by 33% the housing proposed to 60 versus 45, this will exacerbate traffic volumes in Tannery Lane and its junction with the A247 in the heart of our village, which is already overwhelmed at morning and evening rush hours. views over the open countryside to the river Wey will be spoilt as the Green Belt is further reduced and surface water flooding will be increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2376  Respondent: 10837665 / J.H. Lakeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the policy A43 at Garlicks arch because I feel that NO "EXCEPTIONAL CIRCUMSTANCES" exist to warrant the destruction of this ancient woodland and the resultant loss of permanent Green Belt, also there us no proven demand for plots for travelling showpeople to be located here abouts, futhermore the excessive number of homes will virtually join ripley and send and have a detrimental impact on local roads and byways and ignores the flood zone 2 allocations and the fact that the land is contaminated by over 50 years of lead shot accumulation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2430  Respondent: 10837665 / J.H. Lakeman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I object to policy A58 at Burnt Common because the volumes of previous objections caused it to be deleted from the 2014 draft and the 2016 plan's "maximum" has been changed to "minimum" despite the decline in demand for industrial usage evidenced by the 2017 Employment Land need assessment reduction to 3.9 hectares for the whole borough NOT supporting a massive allocation of 10 hectares at Send with the resultant destruction of the Green Belt and increased traffic problems, all this despite empty site and industrial units at Slyfield and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/838  Respondent: 10837665 / J.H. Lakeman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I object to policy A58 at Burnt Common because the volumes of previous objections caused it to be deleted from the 2014 draft and the 2016 plan's "maximum" has been changed to "minimum" despite the decline in demand for industrial usage evidenced by the 2017 Employment Land need assessment reduction to 3.9 hectares for the whole borough NOT supporting a massive allocation of 10 hectares at Send with the resultant destruction of the Green Belt and increased traffic problems, all this despite empty site and industrial units at Slyfield and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I further object to the proposal to inset Send business park from the Green Belt- Policy 2 para's 4.3.15 as Tannery Lane is highly restricted in either direction for large commercial/industrial vehicles, being in an area of open countryside adjacent to the attractive Wey navigation in the Green Belt.

I have lived in Send since 1970 and increasingly in recent years have felt the need to add my voice to defend the peace and quiet I moved here for. GBC seems to have a predilection to ignore the ideals of the Green Belt and the laws constraints to take due account of inadequate infrastructure of roads, school and medical facilities and ignore the traffic and pollution implications in a disproportionate manner for our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2876  Respondent: 10838433 / M.D. Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed volume of building in the Horsley and surrounding Areas.

Our roads are already disintegrating and are crowded. (Try driving through The Drift)

The doctor surgeries are full.

All the schools in the area are full.

Hospital appointments can be up to eight weeks plus.

Do you really think it makes sense to build more houses in this area? Well, I don't.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/190  Respondent: 10838433 / M.D. Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I understand there has to be development within the borough, but to swamp East and West Horsley is not the answer. You already struggle to maintain the infrastructure and with the preposed building on the 'Wisley site' as well it will put an unbearable strain on all the services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/191  Respondent: 10838433 / M.D. Chandler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why this government has to pack south of London with new builds astounds me, surely it would be better to build north of the city and not crowd the south any more than it already is.

Therefore I am against the amount of houses preposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/181  Respondent: 10838529 / Tracey Watson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to submit the following comments and concerns regarding the latest version of the local plan.

- I believe the annual number of houses being proposed each year is too high and needs reducing as the current number does not stand up to detailed scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/256  Respondent: 10838529 / Tracey Watson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• POLICY A22: Land north of Keens Lane, Guildford
  o I do not support the size of the site at the land north of Keens Lane, Guildford for the western end of this site heavily encroaches on the existing properties in Keens, Tangle and Gravets Lane. I would support this site if it was reduced in size to address my concern.
  o I have concerns with the amount of traffic that will be created on Keens, Tangle and Gravets Lane as a result of this site. All of those roads are very small and not designed for the increase that would result. The site would be better served by a single access road from the A322 Worplesdon Road and would support this site if this was the case.
    • I am grateful to see the removal of the sites at Liddington Hall and Fairlands as I did not support them in the previous local plan for numerous reasons.

Other than the points I have highlighted I have no objection and support of rest of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/562  Respondent: 10838529 / Tracey Watson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I support the location of the larger sites, Gosden Hill, the former Wisley airfield, Blackwell Farm and Normandy/Flexford as each has good access to the A3/A31 and railway lines. I especially support the Wisley airfield site as this is clearly brownfield and is perfect for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/62  Respondent: 10839009 / Jacky Fenton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have failed to provide sound evidence for your “late additions” in terms of the Employment Lands Needs Assessment of 2015 (ELNA), which shows an 80% reduction in employment space from previous Assessment carried out by Guildford Borough Council in 2013. This means that industrial space at Burnt Common is no longer needed.

I strongly OBJECT to the industrial development at Garlick’s Arch. This is just not needed since the (ELNA) has shown a reduction of 80% in required floor space from the previous plan. If there is a need for industrial space, then this should be a Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly OBJECT to the housing suggestion at Garlick’s Arch, as there is no more need for these houses. The number of foreign students I feel has been wrongly used to inflate the need. The required 13,860 houses in the local plan is vastly exaggerated. If the population is to grow by 20,000 as suggested in the plan period, we actually need 8,000 homes, (based on an average of 2.5 people per home).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/61</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OJECTIONS TO NEW DRAFT LOCAL PLAN 2016

I have now seen your new revised Local Plan and am appalled by your plans for Send. You have not followed the correct process and have changed every major site in Send proposed for development since 2014. Not only that, you have now added the “Garlick’s Arch” at Burnt Common and a new development of 40 houses and 2 Travellers Pitches on Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1990  Respondent: 10839009 / Jacky Fenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have now seen your new revised Local Plan and am appalled by your plans for Send. You have not followed the correct process and have changed every major site in Send proposed for development since 2014. Not only that, you have now added the "Garlick's Arch" at Burnt Common and a new development of 40 houses and 2 Travellers Pitches on Send Hill.

Your original plan of 2014 proposed 430 houses for Send, but this went down in April 2016 to 185 after many objections. This has now gone back up to 485. You cannot make these significant changes without another full consultation under Regulation 18. This will invalidate the whole process!

You have failed to provide sound evidence for your "late additions" in terms of the Employment Lands Needs Assessment of 2015 (ELNA), which shows an 80% reduction in employment space from previous Assessment carried out by Guildford Borough Council in 2013. This means that industrial space at Burnt Common is no longer needed.

I strongly OBJECT to removing Send from the Green Belt, you are just using this to your advantage to allow for more development. The Green Belt around this area is permanently protected by the NPPF which prevents merging settlements. I This area contains ancient woodland with trees from the 16th Century. 50% of new homes needed could be built on brownfield sites.

I strongly OBJECT to Garlick's Arch as this site was not included in the Regulation 18 draft and has not been consulted upon previously.

I strongly OBJECT to the housing suggestion at Garlick's Arch, as there is no more need for these houses. The number of foreign students I feel has been wrongly used to inflate the need. The required 13,860 houses in the local plan is vastly exaggerated. If the population is to grow by 20,000 as suggested in the plan period, we actually need 8,000 homes, (based on an average of 2.5 people per home).

I strongly OBJECT to the industrial development at Garlick's Arch. This is just not needed since the (ELNA) has shown a reduction of 80% in required floor space from the previous plan. If there is a need for industrial space, then this should be a Slyfield.

I strongly OBJECT to a 4 way interchange onto the A3 at Burnt Common. This would mean the Send Road (A247), would become a through route to Woking for traffic leaving the M25 and A3 and also the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham which would leave it gridlocked all day long and not just at rush hour.
I strongly **OBJECT** to the 40 homes and 2 Travellers Pitches designated to the land West of Winds Ridge on Send Hill. Again this site was not included in the regulation 18 draft and has not been consulted upon previously. This area is within beautiful countryside in the Green Belt which would be spoilt by your development. The area is also a known landfill site with documented unsafe waste which is currently vented. Disturbing this land could leach toxic chemicals into the surrounding atmosphere. The cemetery is opposite your proposed site which is meant to be a peaceful place for people to come and visit their lost ones. Adding another 40 homes with two cars per household will remove the peace and quiet. This proposal is in appropriate due to the narrow width single track country road which becomes very hazardous in winter, providing insufficient access to the site.

I hope you take my objections into account when making your final decisions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/120</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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I hope you take my objections into account when making your final decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/174  Respondent: 10839009 / Jacky Fenton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly OBJECT to a 4 way interchange onto the A3 at Burnt Common. This would mean the Send Road (A247), would become a through route to Woking for traffic leaving the M25 and A3 and also the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham which would leave it gridlocked all day long and not just at rush hour!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/173  Respondent: 10839009 / Jacky Fenton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly OBJECT to removing Send from the Green Belt, you are just using this to your advantage to allow for more development. The Green Belt around this area is permanently protected by the NPPF which prevents merging settlements! This area contains ancient woodland with trees from the 16th Century. 50% of new homes needed could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/129  Respondent: 10839009 / Jacky Fenton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Your original plan of 2014 proposed 430 houses for Send, but this went down in April 2016 to 185 after many objections. This has now gone back up to 485. You cannot make these significant changes without another full consultation under Regulation 18. This will invalidate the whole process!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We would like to register our objection to the proposed New Local Plan. Fifty seven years ago, we moved to the lovely village of West Horsley and over the years have seen it grow, however, it has basically remained a village.

If the proposed developments go ahead, it will become a town, without the infrastructure to support it. If we had wanted to live in a town to raise our family, we would have done so.

It is of great concern to us that these developments will increase the population significantly and without due concern to the Green belt which was set up to prevent the spread of towns particularly around London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It is of great concern to us that these developments will increase the population significantly and without due concern to the Green belt which was set up to prevent the spread of towns particularly around London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the housing development at Clockbarn Nursery. Once again the proposed development would greatly increase the traffic along a narrow road, particularly given that the Marina development will also lead to increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/2497</th>
<th>Respondent: 10839073 / Annie Hutchison</th>
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I object to the proposed new development at Garlick's Arch. GBC has failed to demonstrate the need for a further 400 houses in addition to those already included in the Plan, or the need for such an extensive industrial/warehouse development. The area, which is currently Green Belt, includes ancient woodland, which, once lost, could never be replaced. The area already has an established industrial site at Slyfield. Given the latest Employment Land Needs Assessment 2015 showed an expected 80% reduction in the required employment floor space from the previous draft plan, this could easily be accommodated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2498</th>
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I object to the new A3 interchange at Burnt Common. The roads around Send are already congested: already at peak times it is difficult to safely turn out of Boughton Hall Avenue onto the Portsmouth Road, and the proposed development is likely to result in near-permanent gridlock at Burnt Common. In addition, the road through Clandon is unsuitable for large vehicles: I have seen several "near misses" as lorries come round narrow bends straddling the middle of the road. The inevitable increase in commercial traffic would make these roads far more dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPS16/2502 | Respondent: 10839073 / Annie Hutchison | Agent: |</p>
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I object to the proposed development west of Winds Ridge and Send Hill. This new site was not included in the original plan and has not been consulted on. Apart from the loss of Green Belt this would entail, I understand the area includes vented land fill, increasing the risk of building on the site. In addition, the site is served by a narrow single track road, which could not safely handle the increase in traffic which the development would produce.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5547  Respondent: 10839073 / Annie Hutchison  Agent:</th>
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While I recognise that some level of new house building is necessary, I am concerned that the proposed Local Plan vastly overstates the need for both new housing and industrial expansion and does not take account of the limitations of the infrastructure in the Send area. Accordingly:

I object to the removal of Send village from the Green Belt. The inevitable result of this would be extensive development effectively removing the buffer between Guildford and Woking. Amongst the areas lost would be school playing fields and woodland: a great loss of amenity for all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7612  Respondent: 10839233 / Sheila Harris  Agent:</th>
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With reference to the latest GBC Local Plan, I strongly object to all the proposals noted in the Local Plan now submitted for further development and changes to the Green Belt Boundaries in Send, considering that these are not only significantly different from the previous proposals submitted in 2014 but are both flawed and ill conceived.

I wish to question why the Council consider it necessary to make incursions into current Green Belt areas without first exhausting all available 'Brownfield' sites in the Borough. It is my understanding that Government directives require these sites to be developed as a priority in order that the required housing demand can be satisfied before the need to spoil our beautiful countryside forever.

There are many detailed objections to the particular sites identified (i.e., Garlick's Arch Clockbarn Nursery and Winds Ridge) but my main point is that the development of 'Brownfield' sites is most likely to negate the requirement for these sites to even be considered.

I also object to the lack of clarity given with respect to the derivation of the housing requirement figures. It would appear that the figures have been based on an exaggerated housing need which has resulted in increased numbers from the previously submitted plan, an increase that can only be satisfied by building on Green Belt land.

I therefore re-iterate my strongest objection to the Local Plan for Send in its current form and insist that Guildford Borough Council must reconsider the proposals in their entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/798  Respondent: 10839233 / Sheila Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed changes to increase the number of homes at Clockbarn Nursery to 60 under Policy A42 of the Plan. The increase in number is totally unacceptable and takes no account of previous concerns raised regarding the development of this site with respect to traffic management and safety along Tannery Lane and its junction with the A247 at Send Road. A full and thorough TIA must be carried out to prove beyond doubt that the inherent dangers associated with the additional traffic from this development and the Send Business Park can be managed and the appropriate road and junction improvements can and will be implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed changes for the allocation of 400 homes and 6 Travelling Showpeople Plots at Garlick's Arch under Policy A43 of the Plan. The proposal ignores all previous concerns that the development of Garlick's Arch will destroy ancient woodland and Green Belt land together with the very real possibility of causing drainage problems for the areas of Send Marsh that are downstream of the site. The number of houses proposed at this site is excessive and will undoubtedly adversely affect the local traffic situation in Send and Ripley and will be the start of a 'bridge' of development which will join the two villages thereby defeating the purpose of the Green Belt provision. I would also question whether there is a proven need for Travelling Showpeople Plots at this location especially as it would seem wholly inappropriate to locate what are effectively commercial sites within a residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed changes for the allocation of 400 homes and 6 Travelling Showpeople Plots at Garlick's Arch under Policy A43 of the Plan. The proposal ignores all previous concerns that the development of Garlick's Arch will destroy ancient woodland and Green Belt land together with the very real possibility of causing drainage problems for the areas of Send Marsh that are downstream of the site. The number of houses proposed at this site is excessive and will undoubtedly adversely affect the local traffic situation in Send and Ripley and will be the start of a 'bridge' of development which will join the two villages thereby defeating the purpose of the Green Belt provision. I would also question whether there is a proven need for Travelling Showpeople Plots at this location especially as it would seem wholly inappropriate to locate what are effectively commercial sites within a residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed changes for a new allocation for a minimum of 7000m2 of Industrial or Warehousing on Land at Burnt Common under Policy A58 of the Plan. Development of this area was deleted from the 2014 draft of the Local Plan due to the number of objections raised previously. I would question whether the present demand for Industrial Land is such that there is a need to develop Green Belt land at all let alone change the requirements on this site from a 'maximum' under the 2016 Proposed Plan to a 'minimum' development area under this Plan. I therefore request that GBC explore the development of all existing industrial sites within the Guildford area such as those that are currently available at Slyfield before introducing new industrial sites within the Green Belt areas.

I therefore re-iterate my strongest objection to the local Plan 2017 for Send in its current form and insist that Guildford Borough Council reconsider the proposals accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of Send Business Park from the Green Belt as proposed under Policy P2 (paragraph 4.3.15) of the Plan. I believe that this is the 'thin end of the wedge' that will result in yet further expansion of commercial building at this location which is totally inappropriate given its position within open countryside adjacent to the Wey Navigation and the poor vehicular access in both directions along Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to the proposed building of 1100 homes, a secondary school and six travelling showman sites with yards on sustainable agricultural land between Normandy and Flexford.

This will lead to a 100% increase in the number of home in Normandy thus destroying our village and rural environment. The Green Belt land (site 368) is grade 3 arable and pastoral and has not been removed from the green belt. As we are the only remaining open rural area in between Ash and Pirbright heath lands this will have a devastating impact on the habitat of the remaining wildlife. The urbanisation will threaten the rare birds of the THBSPA, which is only 1km away from this proposed development which 2700 people, 1500 cars, 250 dogs and 190 cats. This could have detrimental effect on the THBSPA.

The development will bring chaos to the already congested roads which frequently come to a standstill at rush hour times. New school will add even more traffic and is there any need for a new school? has not been proven.

More homes should be built on brownfield sites. There are brownfield sites available for another million homes plus developers have running permission outstanding for 65,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal from the Local Plan of site A.46 (land to the South of Normandy and North of Flexford) – 1,100 homes and school. The removal of site A47-50 homes (land to the East of the Paddocks Flexford.)

I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt. There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590 that the land here contributes to the “openness” of the Green Belt.

There is evidence in the sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy.

The land in and around the settlements of Normandy and Flexford Contributes to views into and from the Surrey Hills AONB (HOGS BACK.)

Policy P2 omits any assessment of the Green Belts value. The Green Belt is not just empty space but is an inhabited working environment that safeguards a certain [illegible word] of natural capital. There is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt and at “infilling” 12 of the borough’s Green Belt villages. I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/613  Respondent: 10839393 / F.A. Howell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43- Land at Garlick's Arch, Send marsh

I OBJECT TO POLICY A43 CHANGE AT GARLICK'S ARCH because

1) it will generate much more traffic than we already have to put up with
2) it will join the villages of Send and Ripley (Ripley already overloaded with traffic from Junction 10 on the M25 and a 'short-cut' for traffic from the A3 which ends up in Send!)
3) the thousands of objections that have been made by local people previously have been totally ignored
4) the site frequently floods
5) OUR GREEN BELT AND THE ANCIENT WOODLANDS (DATING BACK TO THE TIME OF ELIZABETH I) SHOULD BE LEFT AS THEY ARE!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/614  Respondent: 10839393 / F.A. Howell  Agent:
Policy A58- Land at Burnt Common, London Road

I OBJECT TO POLICY A58 AT BURNT COMMON because there is already an established industrial area at Slyfield- why cant this be developed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/71  Respondent: 10839393 / F.A. Howell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Green Belt, Policy 2 at paragraph 4.3.15

I OBJECT TO POLICY 2 AT PARAGRAPH 4.3.15 because

1) we are not an industrial area
2) Tannery lane (in both directions) is far too small to accommodate large lorries
3) Council has failed to provide a need for self build plots, additional employment floor space or space for travelling show people in this area.

Council has already received over 3000 objections to the Garlick's Arch site proposal from just one small area of Send (namely Send marsh), which on account of the population density is unanimous! When Council rejected the Wisley Airfield proposal unanimously, that had some effect, and likewise so should this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3414  Respondent: 10839649 / Lawrence Harris  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site proposed under Policy A42a. Planning permission has already been granted for development of a marina and 64 apartments on the adjacent site. Any additional development on Tannery lane will create further safety issues with respect to the traffic loads on this narrow road and its junction with Send Road. A full and thorough TIA must be carried out to prove beyond doubt that the inherent dangers associated with the additional traffic from these developments can be managed and the appropriate road and junction improvements can and will be implemented before any development goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3400   Respondent: 10839649 / Lawrence Harris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site proposed under Policy A43 'which is one of the last minute additions to the GBC Plan. Development of Garlick's Arch will destroy ancient woodland and Green Belt land as well as create severe drainage problems for the areas of Send Marsh that are downstream of the site. Any development of this area will need to be proven by a full and thorough Environmental Study to indicate how these problems are to be addressed. I would also question the need for a further 400 homes over and above the previous figures as well as the need for 7000sqm of industrial space when the Slyfield site would seem to have the necessary acreage available for this purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3403   Respondent: 10839649 / Lawrence Harris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development proposed under Policy A43A. Construction of a new interchange onto the A3 at Burnt Common will impose additional burden on the A247 through Send and West Clandon as this road will now become a primary feeder to the A3 and hence the M25. The existing roads through these villages cannot be widened or upgraded and therefore will be subject to an intolerable increase in the volume of traffic without being able to address the safe flow of that traffic. I would also suggest that any further developments and accesses along the A3 corridor are completely meaningless until the current traffic issues that are encountered on a daily basis at the Guildford By-pass and approaches to Junction 10 of the M25 are resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3410  Respondent: 10839649 / Lawrence Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the site proposed under Policy 44. This is another new site that was not included in the Regulation 18 draft document. As well as being Green Belt land this site has been the subject of extensive landfill activities thus a full Environmental Study is required before it can even be considered for development. In any event I believe that the inclusion of 2 No. Travellers Pitches at this site is wholly inappropriate for both the travellers and the existing community given its proximity to the new housing proposals and other residential developments in the immediate vicinity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7518  Respondent: 10839649 / Lawrence Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In general I object to the apparent failure of the GBC to firstly identify sufficient brown field sites within the urban area for development and the continued support of the GBC for proposals that destroy Green Belt and open countryside particularly along the A3 corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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With reference to Policy P2 of the GBC local Plan I strongly object to the removal of Send from the GreenBelt. I believe that this is the 'thin end of the wedge' and will result in yet further erosion of this vital asset to the well being of the people of Surrey in the future. The latest GBC Local Plan for Send includes a number of changes from the previous version put forward in 2014. I object to the manner with which these additional sites have been included and consider that these significant changes require the full consultation process to be effected not the shortcut procedure under Regulation 19 that the GBC are currently trying to implement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the proposed changes to increase the number of homes at Clockbarn Nursery to 60 under Policy A42 of the Plan. The increase in number is totally unacceptable and takes no account of previous concerns raised regarding the development of this site with respect to traffic management and safety along Tannery Lane and its junction with the A247 at Send Road. A full and thorough TIA must be carried out to prove beyond doubt that the inherent dangers associated with the additional traffic from this development and the Send Business Park can be managed and the appropriate road and junction improvements can and will be implemented.

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I object to the proposed changes for the allocation of 400 homes and 6 Travelling Showpeople Plots at Garlick's Arch under Policy A43 of the Plan. The proposal ignores all previous concerns that the development of Garlick's Arch will destroy ancient woodland and Green Belt land together with the very real possibility of causing drainage problems for the areas of Send Marsh that are downstream of the site. The number of houses proposed at this site is excessive and will undoubtedly adversely affect the local traffic situation in Send and Ripley and will be the start of a 'bridge' of development which will join the two villages thereby defeating the purpose of the Green Belt provision. I would also question whether there is a proven need for Travelling Showpeople Plots at this location especially as it would seem wholly inappropriate to locate what are effectively commercial sites within a residential area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/803  
Respondent: 10839649 / Lawrence Harris  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I object to the proposed changes of a new allocation for a minimum of 7000m2 of Industrial or Warehousing on Land at Burnt Common under Policy A58 of the Plan. Development of this area was deleted from the 2014 draft of the Local Plan due to the number of objections raised previously. I would question whether the present demand for Industrial Land is such that there is a need to develop Green Belt land at all let alone change the requirements on this site from a 'maximum' under the 2016 Proposed Plan to a 'minimum' development area under this Plan. I therefore request that GBC explore the development of all existing industrial sites within the Guildford area such as those that are currently available at Slyfield before introducing new industrial sites within the Green Belt areas.

I therefore re-iterate my strongest objection to the local Plan 2017 for Send in its current form and insist that Guildford Borough Council reconsider the proposals accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/94  
Respondent: 10839649 / Lawrence Harris  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send Business Park from the Green Belt as proposed under Policy P2 (paragraph 4.3.15) of the Plan. I believe that this is the 'thin end of the wedge' that will result in yet further expansion of commercial building at this location which is totally inappropriate given its position within open countryside adjacent to the Wey Navigation and the poor vehicular access in both directions along Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3183  Respondent: 10839841 / John Spencer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have lived here in East Horsley for almost 40 years and the village is growing alarmingly. The basic infrastructure cannot cope with a lot more housing which means many more people using the roads, which are narrow, the shops with inadequate parking, the schools which are not big enough and the medical practice which is stretched already. If more housing is needed on a larger scale then plans must be in place to provide the appropriate services of schools, doctors and shops. Our country lanes cannot cope with the added weight of enormous lorries cutting through from the A3, and M25, they are not in good condition now and will only get worse. Cars are forced off the road by the size of lorries using country lanes to avoid motorways. More housing will bring many more contractors vehicles and consequently roads will suffer with deep rutting and pot holes, already a problem. The Horsleys are old villages which do not have the resources to cope with a dramatic rise in population. They are in the green belt and have many farms and fields with animals. These need to be preserved for future generations to enjoy green open space away from the M25.

We add our agreement to the document drawn up by the Horsley Countryside Preservation Society citing the many reasons that large scale building of houses would be detrimental to the area and hope that local residents' views and reasons will be taken into consideration when this local plan is again discussed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1437  Respondent: 10839937 / Mark Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed Local Plan for the village of Send, Send Marsh and the surrounding Green Belt area.

I object to the Local Plan on the grounds of Guildford Borough Council (GBC) having made major changes to the Plan in recent months. These changes are so significant that another full consultation under Regulation 18 is required, as opposed to Regulation 19, which GBC are trying to use to quickly force through the proposals.

I object to the proposal to remove Send from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that Green Belt land is vital 'to prevent neighbouring towns merging into one another'. Send and its surrounding Green Belt land plays precisely that role, between Guildford and Woking.

I object to the development at Garlick's Arch, which is being proposed as the site for 400 houses and also 7000 square metres of industrial space. The Employment Land Needs Assessment 2015 (ELNA) has concluded that there has been a dramatic reduction in the employment floor space needed, down 80% from the previous ELNA of 2013. This means that there is no longer the need for this industrial space. Also regarding the industrial space, together with the proposed 400 houses at this site; the pressure on an already heavily used A3 would be too great, leading to severe delays, increased accident risk and potential gridlock.

I object to the proposed 4-way A3 interchange at Burnt Common, as Send simply cannot cope with the additional traffic it would bring, especially if the proposed developments at Wisley, Gosden Hill in Burpham and Blackwell Farm go through. Send has one road passing through it, from the A3 down Send Hill, past The Villages Surgery and two schools and on to Woking. The current demand for access to and from the M25 and A3 is already too great, with traffic often crawling for miles, and sometimes at a standstill. There is simply not the capacity for the increase in traffic the interchange would bring, and the increased risk of traffic accidents, particularly around the schools and the centre of Send village would be significant.

I object to the proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill in Burpham and 1,850 houses at Blackwell Farm. There is already intense traffic in these areas, particularly around the M25, and as such will only add to the high volume of traffic passing through Send and Send Marsh, which do not have the infrastructure to cope.

I object to the proposed development of 40 houses and 2 traveler’s pitches at Send Hill and lands west of Winds Ridge (Policy A44 . 1.9 ha). As stated previously, the road through Send is already at full capacity regarding traffic, and could not cope with the additional traffic which would arise from this development. Furthermore, this is a newly proposed site, as it was not included in the Regulation 18 draft, which in turn means it has not been consulted on previously; such a consultation must take place before any decisions are made.

I object to the proposal to build 45 houses at Clockbam Nursery on Tannery Lane. The lane is winding and narrow, with several blind corners, and is only wide enough for one vehicle at a time in many places. To build here would require a huge remodelling of the area and complete construction of a new road, thus decimating this Green Belt land, which is actually prone to frequent flooding (The area is called Send Marsh for a reason). It also acts as an important buffer between Send Marsh and Send.

I object to the Local Plan, as it clearly fails to recognise that there is insufficient infrastructure in and around Send and Send Marsh to cope with an increase in both traffic and population. Not only are the roads unable to take more vehicles, but The Villages Surgery and the two schools are also already under severe pressure, and as such cannot be expected to cope with an increased population. There is also the very real danger of an increased risk of accidents around the schools. Much of the land proposed for development is also prone to frequent flooding.
These are clearly valid objections in the eyes of those who know the area. For these reasons, I strongly urge for the Local Plan to be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2783  Respondent: 10839937 / Mark Pycraft  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill in Burpham and 1,850 houses at Blackwell Farm. There is already immense traffic in these areas, particularly around the M25, and as such will only add to the high volume of traffic passing through Send and Send Marsh, which do not have the infrastructure to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2787  Respondent: 10839937 / Mark Pycraft  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to build 45 houses at Clockbarn Nursery on Tannery Lane. The lane is winding and narrow, with several blind corners, and is only wide enough for one vehicle at a time in many places. To build here would require a huge remodelling of the area and complete construction of a new road, thus decimating this Green Belt land, which is actually prone to frequent flooding (The area is called Send Marsh for a reason). It also acts as an important buffer between Send Marsh and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2781  Respondent: 10839937 / Mark Pycraft  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch, which is being proposed as the site for 400 houses and also 7000 square metres of industrial space. The Employment Land Needs Assessment 2015 (ELNA) has concluded that there has been a dramatic reduction in the employment floor space needed, down 80% from the previous ELNA of 2013. This means that there is no longer the need for this industrial space. Also regarding the industrial space, together with the proposed 400 houses at this site; the pressure on an already heavily used A3 would be too great, leading to severe delays, increased accident risk and potential gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2782  Respondent: 10839937 / Mark Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed 4-way A3 interchange at Burnt Common, as Send simply cannot cope with the additional traffic it would bring, especially if the proposed developments at Wisley, Gosden Hill in Burpham and Blackwell Farm go through. Send has one road passing through it, from the A3 down Send Hill, past The Villages Surgery and two schools and on to Woking. The current demand for access to and from the M25 and A3 is already too great, with traffic often crawling for miles, and sometimes at a standstill. There is simply not the capacity for the increase in traffic the interchange would bring, and the increased risk of traffic accidents, particularly around the schools and the centre of Send village would be significant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2786  Respondent: 10839937 / Mark Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development of 40 houses and 2 traveller’s pitches at Send Hill and lands west of Winds Ridge (Policy A44. 1.9 ha). As stated previously, the road through Send is already at full capacity regarding traffic, and could not cope with the additional traffic which would arise from this development. Furthermore, this is a newly proposed site, as it was not included in the Regulation 18 draft, which in turn means it has not been consulted on previously; such a consultation must take place before any decisions are made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6125  Respondent: 10839937 / Mark Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan, as it clearly fails to recognise that there is insufficient infrastructure in and around Send and Send Marsh to cope with an increase in both traffic and population. Not only are the roads unable to take more vehicles, but The Villages Surgery and the two schools are also already under severe pressure, and as such cannot be expected to cope with an increased population. There is also the very real danger of an increased risk of accidents around the schools. Much of the land proposed for development is also prone to frequent flooding. These are clearly valid objections in the eyes of those who know the area. For these reasons, I strongly urge for the Local Plan to be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6122  Respondent: 10839937 / Mark Pycraft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed Local Plan for the village of Send, Send Marsh and the surrounding Green Belt area.

I object to the proposal to remove Send from the Green Belt (Policy P2). The National Planning Policy Framework (point 80) states that Green Belt land is vital ‘to prevent neighbouring towns merging into one another’. Send and its surrounding Green Belt land plays precisely that role, between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td>I have been a resident of East Horsley for over 30 years. Please do not destroy our environment.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>5. The development at Ockham of Wisley Airfield</td>
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<tr>
<td>4. Station Parade as a District Centre</td>
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</table>
3. Infrastructure already overloaded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I would like to object most strongly to the GLP especially;

1. The removal of the Horsleys from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. The extention of the settlement boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11961  Respondent: 10840129 / Roy Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. Doubts concerning the number of new houses. Develope all Brownfield sites first

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/289  Respondent: 10840161 / Janet Attfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a resident of East Horsley for sixteen years. It is a fantastic place to live and bring up children. There are good schools, social clubs for young and old. There are tennis, badminton, football, art, cricket, scouting clubs. There are facilities for children with special needs. There are 200 members of the University of the Third age running clubs for retired residents. There is the Wheel of Care, where locals volunteer to help those less fortunate. There is a great community spirit. There is a library, a train link to Guildford and London. There are leisure centres in Guildford and Leatherhead. Horsley is surrounded by countryside which is protected by the green belt, which people use everyday. Everyone appreciates the biodiversity of plants and wild life of the area.

In short The Horsleys and surrounding villages are wonderful places to live.

The only downside is that over recent years there has been a great deal of building, usually 'infilling', leading to greater congestion. In turn, the roads have suffered and not been repaired. Surrey is a rich successful borough and yet it has roads that are worse than many other counties such as Kent, Essex, Devon and Hertfordshire. Indeed they are worse than some of the third world countries we see on TV. Also it is becoming increasingly difficult to find parking spaces, when shopping or visiting hospitals.
I have looked at the proposed building plan for Guilford and Horsley and find the plan totally unacceptable. The proposed building expansion of the area will completely change the character of the area. By allowing any of the green belt to be destroyed, more urbanisation will increase congestion and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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If smaller homes are built with small plot sizes then there will be more congestion. There will be more pressure on the local infrastructure. Our schools are already full and services stretched. There are not enough Police to care for the proposed influx of people. There will be more pollution and less countryside for those families to enjoy. The proposed building expansion is unsustainable.

I consider myself very lucky to live in the Guildford area. As your proposed planning document states we have low unemployment. It has a character of its own and yet is within striking distance of the job opportunities in London, bringing wealth from the city to the surrounding area. If the village flavour of the Horsleys and surrounding settlements are changed, then those people sustaining Guildford, will go elsewhere.

The Borough Council should be proud of the environment they have created. I urge you not to spoil the character and sense of community that Surrey has worked hard to achieve. As Joni Mitchell sings in her song 'Big Yellow Taxi'- 'You don't know what you've got till it's gone'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the inclusion of the A35 and Three Farms Meadows site. This new plan increase the congestion of the local roads, which in many cases are country lanes. The urban sprawl suggested will increase pollution, increase congestion and change the character of the villages now under threat.

The proposed development at Wisley is totally out of the local character of surrounding villages. It is potentially extremely dangerous, as it's exit will be on to a very dangerous junction on the A3 just on the slip road from the M25. I am frightened to envisage children playing close to this fast dual carriage way. Also there will be insufficient work for those residents and so they will have to travel to either Horsley or Woking station. The roads to either of these stations are very narrow. They are also part of the Surrey cycle way. Those roads will become extremely dangerous to any cyclists or walkers. They are not big enough for regular bus routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/931  Respondent: 10840161 / Janet Attfield  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very annoyed to see the proposed changes to the Greenbelt designation stated in this proposed plan. The Greenbelt designation was put in place to protect the green spaces, thus preventing pollution and protecting wildlife. They maintain local residents mental and physical health as they enjoy these spaces. The parent Greenbelt maintains the character of the villages and attract people with good incomes to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/932  Respondent: 10840161 / Janet Attfield  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to proposed development on flood zone 2and 3. The houses built there will be prone to flooding and cause untold misery to the residents long after the builders and developers have gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3613  Respondent: 10840193 / Nicholas Pickford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Directs more office space to an extended business park (policy E4) which will increase peak time congestion and encourage rat-running through residential areas which is already a major problem.

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.14a).

Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

Disregards an independent landscape study which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review (4.3.8)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/893  Respondent: 10840289 / John Elgar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan: Strategies and Sites June 2016

I am writing to raise my objections and comments re the above, in particular in respect of its impact on the Horsley and neighboring villages, as follows:

1. I strongly object to the proposed removal by “insetting” of West and East Horsley villages from the Metropolitan Green. This appears to be indiscriminate and is entirely inappropriate and with no justifiable basis. The Green Belt is established by national legislation for the preservation of the countryside and should only be used for development as a last resort in very exceptional circumstances. I am also concerned by the excessive proposed use of Green Belt for development in general, and consider that greater use should be made of brownfield and redevelopment sites before encroaching on Green Belt land for development.

1. I object to the density and timing of new housing proposed for West Horsley and East Horsley villages. The main proposed Horsley new development sites amount to 533 new homes which is a staggering high increase on existing homes (35% increase in West Horsley) and at a much higher density out of character with the village. This level of development would massively and irreversibly impact on the rural nature of the villages, and is simply unsustainable in terms of the capacity of the local infrastructure (roads, drainage etc) and amenities. The
extent of proposed new housing for the Horsley villages is disproportionately high as compared with the Borough as a whole. The proposed timing (between 2018 and 2022) is also inappropriate as non-Green Belt sites should be used first.

I object to the massive scale of development (2000 homes) proposed for the Wisley. This is entirely inappropriate for a Green Belt and, especially when combined with the proposed new housing developments in East & West Horsley, would completely overwhelm the nearby infrastructure and villages and including Horsley, Ockham and Ripley.

West and East Horsley villages have a rich historical mainly agricultural heritage, and are characterized by its mix of very old and newer houses surrounded by and interspersed with farmland and woodland. The open character of the Horsley villages makes an important contribution to the openness of the Green Belt hence in accordance with the National Planning Policy Framework (NPPF) the villages should remain within the Green Belt. It is noted that the NPPF requires new developments to respect the character and density of existing housing and be limited in quantity by availability of infrastructure and local facilities.

The local infrastructure is already stretched to capacity by high volumes of traffic, and the Council struggles to keep up with maintenance of roads and draining as it is. The proposed developments would utterly overwhelm the existing infrastructure, whilst severely and permanently damaging the rural character of the area.

I am concerned by the overall strategy in the Plan of proposed extensive use of Green Belt for development. The primary need for affordable and social housing is clearly in an round Guildford as opposed to the rural areas, yet the plan seems to focus on large scale Green Belt development instead of regeneration and development within Guildford itself. This approach seems fundamentally wrong and would inevitably lead to increased urban sprawl and spoiling of the borough.

It is unclear why it is proposed to remove the Horsley villages from the Green Belt, whilst at the same time creating new Green Belt around Ash and Tongham. This is clearly inconsistent.

I would also question the need for the very high rate of new housing proposed for Guildford Borough overall, being far in in excess of actual recent population growth, and see no justification for driving such a dramatically increased rate of population growth in the Borough. My understanding of the need for new homes in the Horsley villages is only for a relatively small number of smaller and affordable homes.

Overall I consider the Plan to be unbalanced in inappropriately using Green Belt for development rural areas, which would be unsustainable in terms of local infrastructure, in preference to first making use of brownfield and redevelopment sites to meet housing needs. The Plan also overplays the need for economic development in rural areas.

Councillor Paul Spooner recently stated that "we have also listened to the what you said in the last consultation". It is disconcerting that after very extensive and constructive comments and objections raised by local residents to the Draft Local Plan published for public consultation in 2014, the proposed New Plan is if anything even worse than before for the Horsley villages.

I trust my objections and comments will be taken into consideration, in particular in retaining the Horsley villages within the Green Belt, and scaling back the proposed Horsley and Wisley developments to a sustainable level appropriate for Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| I have lived in the Send Marsh area since 1968. |
| I OBJECT to all erosion of the green belt. |
| I OBJECT to site A43 Garlicks arch. |
| I OBJECT to site A43a the on and off ramp at Clandon- this will increase traffic problems in the villages, not help them. |
| I OBJECT to site A45 The Talbot- this is overdevelopment in a conservation area. |
| I OBJECT to site A57 The Paddocks- this is unlawful. |
| I OBJECT to any "in- setting" (i.e removal) of any villages from the Green Belt. |
| I OBJECT to the disproportionate amount of development in one area of the borough. |
| I OBJECT to the limited consultation period. |
| I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice. |
| I OBJECT to the lack of any evidence for the alleged housing need numbers. |
| I OBJECT to the lack of immediate provision for new schools. |
| I OBJECT to the lack of any immediate provision for doctors surgeries. |

Why are many of our local villages in the pipeline for local destruction. Surely we should be looking to preserve our green belt. Once they are gone, they are gone forever.

I am 78 years of age. When I die I would like to leave behind a country that is England- our green and pleasant land- not a concrete mess, trying to accommodate all and sundry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp173/148 | Respondent: 10840321 / J.A. Manlow | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy 2 at paragraph 4.3.15 because:-

If Send business Park is taken out of the green Belt our countryside is systematically now being destroyed. This cannot be allowed to happen with all this proposed extra housing etc, surely this will be an enormous strain on medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1547  Respondent: 10840321 / J.A. Manlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because:-

60 Homes – our schools will be even more overcrowded – what about extra traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1548  Respondent: 10840321 / J.A. Manlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick’s Arch because :-

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]; also again traffic problems; not to mention the 400 proposed new homes – again even more overcrowding in schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1549  Respondent: 10840321 / J.A. Manlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to Policy A58 at Burnt Common because:

I live in this area. I have to work out the best time to drive up Send Marsh Dip (top of Portsmouth Road) because it’s like committing suicide at certain times trying to turn right. Your plans will make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. The Garlick’s Arch site has a particular conservation sensitivity since it is covered in ancient woodland. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A43 at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. The Garlick’s Arch site has a particular conservation sensitivity since it is covered in ancient woodland. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to **Policy A43.30** the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to **Policy A43.30** the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to **Policy A44** the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The sub-soil of the existing site contains unsafe land fill waste, which is currently vented. The proposal to include two travellers pitches is completely inappropriate due to the narrow single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/39  Respondent:  10840641 / John Pyne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object also to Policy A 43 designated for 400 houses and 7,000 sqm for industrial use at Burnt Common, our local roads cannot cope with any further rise in traffic levels, Potters Lane in particular already becomes congested and dangerous with narrowing sections and tight bends, especially at peak times during the day. Potters lane has become a 'rat run' at rush hour especially in the morning and I have witnessed to many accidents and near misses in the 20 years I lived in Potters Lane. A life will be lost if the weight of traffic increases beyond the level it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/38  Respondent:  10840641 / John Pyne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development policy A44, for 40 homes and 2 travellers pitches opposite Wind Ridge on Send Hill, in Send Surrey. This peaceful area must be saved and is totally unsuitable for 2 travellers pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>7) I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.</td>
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<td>3) I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPS16/1572</th>
<th>Respondent: 10840769 / Rosemarie Haxton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>
4) I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/1574</th>
<th>Respondent: 10840769 / Rosemarie Haxton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

5) I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1575</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>

6) I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a local resident, I am very concerned about the proposals for the removal of our villages from the green belt and the extensive building projects that will mean we no longer live in villages with a village community and surrounding green areas and ancient woodland. The infrastructure will not sustain these proposed changes on such a large scale.

My main objections are:

1) I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

2) I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Policy A42 change at Clockbarn in Tannery Lane because,

The increase to 60 homes in place of 45 homes is 33% more and too much for the area and therefore making the current access and traffic problems affecting Tannery Lane and A247 junction during rush hour and school drop off/collection worse.

The current removal of the Green Belt in our village will increase, and there will no longer be views of the River Wey Navigation that we and our children currently enjoy.

Surface water flooding which is already an issue, will worsen.

The previous objections by the local people to this have obviously been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3210     Respondent: 10840769 / Rosemarie Haxton     Agent:

I object to the Policy A43 change at Garlick’s Arch because:

It ignores all the previous objections made by local people who will have to live with the consequences.

There is no known demand for 6 Travelling Showpeople plots in this location.

This is permanent Green Belt and no "exceptional circumstances” for its removal exist, and, if this occurs, Ripley and Send will no longer be separated and therefore the purpose of Green Belt will no longer exist as well.

It will cause over-development and destruction of our village and 400 homes is excessive, causing excessive traffic which the roads of Send and Ripley cannot cope with.

It is beautiful ancient woodland that existed at the time of Elizabeth 1 and should be left alone for future generations.

This is currently a flood zone 2 allocation and already has frequent flooding.

There is contamination by lead shot accumulated over fifty years.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3211  Respondent: 10840769 / Rosemarie Haxton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

It was deleted from the 2014 draft due to all the previous objections

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a reduction in need for industrial land

As there are currently empty sites and units at Slyfield and Guildford there is no reason to build industrial or warehouse development in the middle of the Green Belt land

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not an over allocation of 10 hectares at Send in the Green Belt.

The impact on surrounding roads will create traffic chaos and join up Send and Ripley to defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1504  Respondent: 10840769 / Rosemarie Haxton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because:

This is an old non-conforming user in an area of outstanding countryside next to the beautiful Wey Navigation

There is highly restricted vehicle access along Tannery Lane in both directions that would not accommodate any increase in volume or type of traffic

Any increased expansion or development at this site detracts from the Green Belt and is completely inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3150  Respondent: 10840801 / Carolyn Kurk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To move the green belt boundary to exclude the fields behind Shalford Village Hall (the map shows a new area in this location bounded in pink), and which I understand is proposed to be Open Space.

Extend the village settlement boundary to include these fields, making it easier to develop.

These fields must continue to be protected as previously concluded by The Guildford Landscape Character Assessment & Guidance published in 2007 by Guildford Borough Council and Landuse Consultants.

The proposed changes will remove the field's current protected status and leave them more open for housing development. Any development would in addition exacerbate the existing traffic problems in the adjacent Chinthurst Lane and Shalford as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3148  Respondent: 10840801 / Carolyn Kurk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in response to Guildford Borough Council's new Local Plan.

I most strongly object to the removal of East and West Horsley from the Green Belt and feel it would be disastrous for the character of both villages. Green Belt should mean Green Belt and should not be made available for development.

I object to the number of houses suggested being built in the villages due to the fact that schools, doctors and parking are already at breaking point. The roads would become even busier and they were not built to sustain so much more traffic.

If you are going to build in the Horsleys then I would suggest a residential home, a day centre or something like it for the people of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the latest version of Guildford borough council proposal because the access to these fields is already a heavily congested country lane and also because the access to these said fields is not sufficiently wide to accommodate an entrance and exit to these said fields, side by side.

These were my objection to the previous GBC local plan and they are not altered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3404  Respondent: 10843233 / David Hardiman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that the inflated number of new houses proposed seems to arise from a Startegic Housing Market Assessment (SHMA) that was generated by a consultant's model which is not revealed in the plan. Nor apparently to GBC. This SHMA target housing number seems to have been further increased by GBC to give population increase which is almost 70% higher than the official estates for population growth in the Borough. The scale of this increase has alarming results e.g. I am led to believe up to 35% in existing West Horsley households which would seem incredible! If this is indeed how the calculations were formed it is alarming, and a demonstration of a lack of understanding of the local environment, population and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6608  Respondent: 10843233 / David Hardiman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The impact on the Horsley villages of such a huge mix of new development under 2 miles away would be significant. In particular added congestion on the A3 and M25 trunk roads and congestion on local village roads and lanes. Not to mention concerns over poor air quality from the significantly increased traffic and other pollution catalysts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>This classification results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments. Again, the infrastructure - roads, car parking - cannot cope with significantly more flow.</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I am not aware of anyone in this county, let alone this nation, who voted for destroying the Green Belt. We already live in one of the most overcrowded parts of the country. Roads are congested, schools are full to capacity and hospital waiting times are a joke. Just to drive out of our village in the morning can take up to 15 minutes to cover a few hundred metres. This is stressful and will only get far worse with more houses, particularly on the scale proposed.</td>
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<tr>
<td>Further housebuilding will not only worsen an already congested road network, but the overcrowding will create further pressure on schools, hospitals, and other services. What is GBC doing to consider the wellbeing of their constituents?</td>
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<tr>
<td>High volumes of traffic and congestion have obvious negative effects. These include road collisions, the severance of communities, the costs of delays and the unreliability of journey times to people and businesses. Environmental and health impacts include traffic noise, air pollution and amenity issues. Some parts of the major roads in Surrey (including those around the Horsleys) operate significantly beyond their capacity, resulting in traffic congestion, and forcing drivers down rural / country lanes to avoid main roads, leading to further congestion, road accidents and pollution.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove the Horsleys from the Green Belt. The "exceptional circumstances" required before taking such action have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13850  Respondent: 10843233 / David Hardiman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlement for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3482  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3483  Respondent: 10843361 / Natalie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3484  Respondent: 10843361 / Natalie Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3473  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3474  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I object to POLICY E2 - Location for new employment floorspace</th>
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<tbody>
<tr>
<td>• It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.</td>
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<tr>
<td>• I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<th>I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace</th>
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<tr>
<td>• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3479  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3480  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3481  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY E9 - Local centres

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3463  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/3464  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H2 – Affordable homes

• Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3466  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H3 – Rural Exception Homes

• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/3486  Respondent: 10843361 / Natalie Brown  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**I object to POLICY I4 Green and blue infrastructure**

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.
- All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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### Comment ID: PSLPP16/3468  Respondent: 10843361 / Natalie Brown  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3469  Respondent: 10843361 / Natalie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.
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<th>Comment ID:</th>
<th>PSLPP16/3470</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P4 – Flood risk and water source protection zones

- Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3461  Respondent: 10843361 / Natalie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY S1 – Presumption in favour of sustainable development

• No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No statement of how economic, social and environmental impacts should be balanced.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3462  Respondent: 10843361 / Natalie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/859  Respondent: 10843457 / Kelvin Hayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a local resident, I am writing to object most strongly to some elements of the new local plan.

The Horsleys are rural villages and have no infrastructure suitable for 533 new houses and their occupants. The local primary school is already over-subscribed and parking in the village, particularly at the station, is limited.

The Green Belt was set up to protect such places for future generations, it should never be open to negotiation.

I do accept that we have a need for more houses, particularly so called “affordable” properties and those for older residents, but going by recent developments, the houses that will be built in this area will be in the upper price bracket, and as such will not alleviate any housing problems that the wider area may have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1866  Respondent: 10843457 / Kelvin Hayes  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</th>
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</table>

Please see my personal objection to this flawed and unbalanced local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/74  Respondent: 10843489 / Philip Fleming  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I have just reviewed the revised Local plan that was published on 6 June, and I find it completely unacceptable for the following reasons:

1. I do not believe that the population increase has been correctly estimated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/126  Respondent: 10843489 / Philip Fleming  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>

1. The proposed development of 2000 homes on the Wisley Airfield site will have a dramatic negative impact on the Horsleys and I do not agree that the development should be permitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/199</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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1. The number of houses proposed for the main sites in East/West Horsley is far too many and will change the distinct nature of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp172/4149</th>
<th>Respondent: 10843521 / Yvonne Woozley</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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1. I do not agree that the village areas should be removed from the Green Belt. This is effectively a way of lowering the hurdle to build on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42
Now 60 homes in place of 45 homes previously
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much]
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4150  Respondent: 10843521 / Yvonne Woozley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch, Send Marsh, Policy A43.
Now 400 homes and 6 Travelling Showpeople plots
I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4151  Respondent: 10843521 / Yvonne Woozley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.
Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2329  Respondent: 10843521 / Yvonne Woozley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a - somewhat rudimentary- map of all the proposed development the impact of the changes can be seen in their entirety (See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1450  Respondent: 10843553 / Maria Erskine  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to express my total objection to all proposals to build on green-field sites in Surrey and elsewhere. There is clearly now great importance in exerting pressure to preserve all wild-life sites and green fields for future generations and building on such sites (even when they are relatively out-of-sight from general passers-by; in essence covert building) must be prevented with utmost attention to detail and fastidiousness.

The principle of protecting these crucial sites, even to the extent of economically disadvantaging the area, is clearly of such extreme importance, that failure to do so amounts to nothing but total dereliction of duty. This view is very typical of the vast majority of people who live in all parts of the county and elsewhere. It is of utmost importance to everyone that you protect wild-life and farming sites for living creatures and ourselves.

When changes of the scale proposed are so vast it is difficult to comment on specific sites. Please regard this e-mail as an objection to all building proposals affecting wild-life and green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2686  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building of 45 houses at Clockbarn Nursery in Tannery Lane, Send as the junction at the top of Tannery Lane is already very narrow and dangerous with limited visibility. Tannery Lane is a country lane and is not designed for such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7551  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
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<tr>
<td>1. I object to the idea of building 400 houses and 7000 sq metres of industrial space at Garlick's Arch in Send. This site is covered by ancient woodland and the site also floods. GBC have failed to disclose their housing calculations which is out of order.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPS16/2688  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the new interchange idea with the A3 at Burnt Common. Send would have to cope with even more traffic and it is very busy already. Send Road would just become gridlocked. Pollution levels and noise would become much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7553  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new interchange idea with the A3 at Burnt Common. Send would have to cope with even more traffic and it is very busy already. Send Road would just become gridlocked. Pollution levels and noise would become much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2687  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the development of 40 houses at the top of Send Hill in Send. Again this is a narrow road at the top of Send Hill and is narrow width single access country lane. This development would spoil a very attractive road set in lovely countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7552  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the development of 40 houses at the top of Send Hill in Send. Again this is a narrow road at the top of Send Hill and is narrow width single access country lane. This development would spoil a very attractive road set in lovely countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5979  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Send village being removed from the Green Belt. The Green Belt was meant to be permanent and there are no special circumstances to justify abandoning it. Send's Green belt is a buffer to keep Woking and Guildford merging. Local councillors and central government gave a clear election promise to protect the Green Belt and they have now gone against this which is totally unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16816  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to Send village being removed from the Green Belt. The Green Belt was meant to be permanent and there are no special circumstances to justify abandoning it. Send's Green belt is a buffer to keep Woking and Guildford merging. Local councillors and central government gave a clear election promise to protect the Green Belt and they have now gone against this which is totally unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/22  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

I object to Green Belt, Policy 2, paragraph 4.3.15 regarding Send Business Park being taken out of the Green Belt altogether. This Business Park is in a beautiful area adjacent to the Wey Navigation. Tannery Lane is effectively a country lane and there is highly restricted vehicle access in both directions of Tannery Lane. Any more development on this site will detract from the beauty of the Green Belt in that area.

Overall, the traffic and pollution implications of the above proposals will be untenable. We do not have the infrastructure in place to be able to cope with such massive over development of Send. Please take Send's objections to these proposals seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/293  Respondent: 10843585 / Jackie Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 as Tannery Lane is a country lane and development at Clockbarn Nursery will make access and traffic problems worse at the A247 junction. This is already a dangerous junction with poor visibility. It will also spoil open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/294  Respondent: 10843585 / Jackie Payne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A43 regarding development at Garlick's Arch as this means destroying a beautiful ancient woodland and huge canopy of trees and will cause massive over development of our village with the number of homes being proposed as excessive. Development of Garlick's Arch will generate a huge amount of additional traffic and cause massive congestion in the local roads in Send and Ripley. There is no proven demand for travelling showpeople plots in this location. Pollution levels will rise and these are already a concern in this area. This proposed development is already subject to frequent flooding. It will effectively join Send and Ripley together and defeat the key purpose of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/295  Respondent: 10843585 / Jackie Payne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to Policy A58 regarding land at Burnt Common. There is no need to build an industrial development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. The impact of such a development at Burnt Common will again have impact on small surrounding roads and there will be traffic gridlock. The roads in Send and Ripley will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/173  Respondent: 10843873 / Allyson Mulvihill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above plan. We do not need 400 more houses. The ground you have selected was not on the original plan and is green belt.

This would be disastrous for Send and the Burnt Common area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4537  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Evidence Base and documents:

The whole basis for the plan is justified on the results from an external consultancy. The information from the Strategic Market Housing Assessment [SHMA] belongs to Guildford Borough Council but no explanation has been given as to the calculation of figures or the model used. The assessment and calculation process has not been transparent. These figures, however they were calculated, must be revisited following the results of the recent EU referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/1562</th>
<th>Respondent: 10843905 / G King</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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**Site Allocation Policy A35 Former Wisley Airfield – Strongly Object**

I object to this development being on green belt. The scale, bulk and density of the plan on a narrow airstrip is completely inappropriate for the area. The conservation area of Ockham Village, which only has 150 houses, would be completely swamped by this development. The proposed development would have a detrimental impact on the openness of the Green Belt surrounding it. The effect on the habitat in the Thames Basin Heath would be devastating. Damage will occur to the habitats of the protected and endangered rare species. The ground nesting birds would be disturbed by the building works and then the volume of people living in close proximately not to mention the pets that would be introduced to the area.

The surrounding villages, Ripley, Effingham, East and West Horsley, do not have the infrastructure to support such a development. The local schools are over-subscribed and it is already difficult to get a doctor’s appointment at the Medical Centre in East Horsley. The extra volume of traffic would cause even more congestion. The lanes are narrow in places and not very well maintained. The proposed development is on an elevated site and there are already water table problems with localised flooding in the area. Some roads become impassable, Ockham Lane, Ripley Lane, East Lane, Ockham Road North and parts of The Drift. There is no spare parking capacity at Effingham Junction or Horsley stations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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with localised flooding in the area. Some roads become impassable, Ockham Lane, Ripley Lane, East Lane, Ockham Road North and parts of The Drift. There is no spare parking capacity at Effingham Junction or Horsley stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1561  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Allocation A39 – Object

This area already has water drainage problems. The proposed access area to the site has poor visibility along Ockham Road North where the sight line is blocked by a railway bridge and the road floods. It also backs onto ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6862  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1560  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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### Site Allocation A41 – Strongly object

Is on green belt and backs onto ancient woodland. This side of East Lane is not densely populated and retains a rural aspect and openness. I notice that in recent months the owners of the land have allowed the hedges to fall into neglect in an attempt to obscure the openness.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Site Allocation A41 – Strongly object

Is on green belt and backs onto ancient woodland. This side of East Lane is not densely populated and retains a rural aspect and openness. This was not identified as a site for development previously yet is added because the landowner has made it available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/14903</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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</table>
D1 – Making Better Places

Culturally we rely on our cars and suggesting that people are going to walk or cycle would mean a cultural shift. How is this going to be encouraged, monitored and enforced? The roads around the Horsleys are narrow and pot-holed, with poor street lighting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14904  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1 – Homes for All - Affordable Homes

80% of Surrey house prices are not affordable to most workers in the local area. These houses will not be affordable. The proposal that by setting the price at 80% will suddenly transform the ability of a nurse or teacher to purchase is unsubstantiated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14901  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery – Object

Infrastructure & Services for East and West Horsley

The local plan proposes an huge increase in the number of houses is the Horsleys yet no plans on how the local infrastructure will be expanded or improved to accommodate the increase.

There is no mention of how infrastructure is to be funded. There is no plan or details for management of increased traffic in the villages. There is no mention of how the water drainage and the foul drainage system infrastructure will be upgraded to cope with the increase demand placed on these services.
Specific existing issues which this plan will exacerbate include:

- There is only a very limited bus service and no buses at weekends.
- It is difficult to get a Doctor’s appointment at the Medical Centre in East Horsley, it can be a 2 week wait. The walk-in clinic where appointments are released on the day starts to queue before 8.00am in the morning for 8.30am surgery opening time.
- The junction of Ockham Road North and Kingston Avenue, the location of East Horsley Medical Centre, is already difficult to negotiate.
- Parking is full every weekday at Horsley and Effingham stations.
- Ockham Road North between Horsley Station and East Lane is repeatedly flooded in moderate rainfall. Pedestrians are forced to take cover in driveways. Converting land to housing will exacerbate this issue.
- East Lane between Edwin Close on Long Reach repeatedly floods in moderate rainfall.
- The Raleigh School does not have enough places to meet the current demands. No plans have been published for creating further school places for children of all ages in the Horsleys. The traffic in out of all of the schools in the immediate area causes a lot of congestion. Parked cars for events at Glenesk School cause a lot of parking and traffic problems on East Lane.
- West Horsley will have no facilities, the small village shop is about to close. The Post Office closed a few years ago and is now housing. Presumably GBC regard this as a success according to the proposals in this plan.
- The number of houses proposed and the increase in size of the village is out of character with the rural landscape. The density of housing on the proposed sites is very high and not in keeping with the rest of the village. West Horsley has a mix of low density housing in roads and streets off East Lane and The Street, these have been added gradually and sympathetically over the decades. West Horsley is defined by its openness of hedgerows and agricultural land with a number of historic buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14899  Respondent: 10843905 / G King  Agent: 10843905 / G King

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt – I strongly object to the removal of the Horsleys and other villages in Guildford Borough from the Green Belt.

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.


This fundamental foundation of the purpose of Green Belt has been ignored by this plan. If the proposals in this plan are carried out then Green Belt will be irreversibly removed and a conurbation created from Bookham and Cobham through to Guildford. This is diametric opposite of the Green Belt’s purpose. This plan is predicated on the assumption that it is acceptable to convert Green Belt to housing. This must be the option of last resort, not the starting point.
I strongly object to the disproportionate amount of development proposed for the east of the borough, the Horsleys, Wisley, Ockham, Ripley and Send. The proposed developments of A25, A35, A36, A37, A38, A39, A40, A41 and A43 do not respect the character and density of housing in the area, a requirement of The National Planning Policy Framework (NPPF).

I strongly object to these proposed developments within the plan and the lack of planned improvements to infrastructure and services. I object to the detrimental impact on transport, local roads and road safety. I object to the proposed high density development along the A3 corridor when this road is already at full capacity and struggling to cope. Rail commuters will drive to the stations, Woking, Clandon, Horsley and Effingham which already have full car parks. The village centres will be gridlocked by the amount of people trying to transition through them and lose their sense of community. The green belt will be destroyed and the village areas will combine to look like a suburb of London. Guildford Borough is renowned for its towns, urban spaces and contrasting rural and wooded countryside and villages it will be ruined forever under this proposed plan.
Evidence Base and documents:

I do not understand how the figures for the number of properties required for the Borough have been arrived at. The information from the Strategic Market Housing Assessment [SHMA] belongs to Guildford Borough Council but no explanation has been given as to the calculation of figures or the model used. The assessment and calculation process has not been transparent. These figures, however they were arrived at, are now invalidated by Brexit.

I strongly object to the disproportionate amount of development proposed for the east of the borough, the Horsleys, Wisley, Ockham, Ripley and Send. The proposed developments of A25, A35, A36, A37, A38, A39, A40, A41 and A43 do not respect the character and density of housing in the area, a requirement of The National Planning Policy Framework (NPPF).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/544  Respondent: 10844129 / Tim Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5926  Respondent: 10844193 / Lauren Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object in the strongest possible way to the proposed development in Normandy contained in the draft local plan and named as site A46. The reasons for my objection are as follows:

- The proposed site is within the Green Belt. The NPPF states that Green Belt land may be developed in “very special circumstances”. GBC has not provided any argument that demonstrates these are exceptional circumstances. Fulfilling the housing requirement is a regular, calculable requirement, and there is nothing exceptional about this. The NPPF states that unmet housing need does not constitute the ‘very special circumstances’.
- I understand that underdevelopment in recent years means that there is an increased need for housing in the new local plan. This cannot justify ‘very special circumstances’. If it did, local authorities would be incentivised to create peaks and troughs in order to circumvent planning regulations. GBC must plan the current housing need within the framework that would have been available to it had there been no backlog.
- The size of the proposed development is disproportionate to the size of the village. I understand that Normandy’s current population is 2300. Adding an additional 1200 households would double the size of the population, permanently destroying the character of the village.
- The proposed development ignores my right to live in a rural environment. I chose to live here because of its rural nature, green surroundings, access to countryside and small size. The proposed development would permanently destroy all these characteristics.
- GBC’s SHMA does not provide methodology for its calculation of housing need. When responding to a FOIA request, it replied that the algorithm underpinning the calculation was outsourced to a private company and is therefore private IP. This is immoral, in addition to making the calculation ineligible for consideration in the planning process. GBC has a public duty to show how the housing need has been calculated and it is a moral outrage to claim that the workings cannot be disclosed. This significant public decision must be within the public domain. If the model cannot be disclosed then it cannot be relied upon as part of GBC’s evidence.
- The SHMA does not demonstrate consideration of reduced population growth, and also assumes a level of immigration that now may not arise in the current political climate.
- There is no demonstrated need for a secondary school in Normandy. Local schools such as Kings School and Ash Manor are significantly undersubscribed, and an additional new school is being built in Mayford. Furthermore, the demographics of Normandy shows a skew towards an older population who have no current or future need for this amenity. The proposed school in particular does not take into account the needs of the local community.
- GBC has not maximised development of brownfield sites before proposing to build on green belt. Nor has GBC taken steps to ensure that all urban sites are in full use before destroying the green belt. Only 2742 homes are planned in Guildford, an urban area with far greater capacity for absorbing new housing than its surrounding small villages and green belt.
- The local plan demonstrates a preference for large scale developments with significant impact on local areas instead of multiple smaller developments whose impact would be less harmful overall. GBC has a public duty to minimise the harmful impact of proposed development and a greater number of smaller developments would be less impactful than the proposed large scale developments. It is fairer overall to spread development through the region rather than to select three areas to permanently destroy, which has perhaps happened because this offers less work and less resistance for the council. This is not in the public interest.
- Finally, I have significant concerns about traffic. I live on the A323 and at peak times it often takes me an unacceptable amount of time to pull out of my driveway, or to queue on the main road before I reach home. I do not believe that this road has the capacity to cope with the additional volume of traffic the proposed development would bring. Furthermore, additional traffic from the new development in Aldershot has yet to be taken into consideration. We also have a major problem with speeding on this road, which I think will be exacerbated by the development. Glaziers lane will be perceived as the local road serving the development, and the Guildford Road will be perceived as the end of the built up area, so that drivers will be even less likely to adhere to the speed limit.

I trust that these points will be given due consideration as part of the consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6930  Respondent: 10844353 / Julia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan on the following grounds:

1) I object to the building of the enormous number of houses being built in Ripley, Send and Clandon. These communities do not need such over development. The infrastructure cannot cope with such a development. The development should be in urban areas with adequate transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6935  Respondent: 10844353 / Julia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object due to the congestion on the roads. There is already a lot of traffic coming through Ripley, which is often at a standstill at rush hour. The Wisley Airfield development alone would add an awful lot of traffic as the potential residents would need their cars to go to Horsley and Woking stations and to go to London. The roads in the area are too narrow to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6940  Respondent: 10844353 / Julia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5) I object due to the congestion on the main roads (A3 and M25). Wisley Airfield, Garlick's Arch and Gosden Hill developments would add to the already congested roads.

6) I object due to poor air quality concerns. The developments mainly at the North East of the borough would create more congestion and increased air pollution which would be very detrimental to people's health.

I hope you will take my objections into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6933  Respondent: 10844353 / Julia Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to Ripley, Send and Clandon being removed from the Green Belt. This is a lovely area where people from urban areas come for walks and relaxation. Development should be done on brownfield sites like at Burnt Common rather than at Garlick Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6939  Respondent: 10844353 / Julia Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the development in areas of flooding. Garlick's Arch is in such an area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5834  Respondent: 10844545 / Paul Cretney  Agent:
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>I object to the proposed development sites in East and West Horsley on the grounds that the number of houses being proposed is excessive and wholly disproportionate to the size and supporting infrastructure of the existing villages. The local amenities (schools, doctors, public transport, roads) would be put under further severe strain with such an increase - in the absence of any mitigating measures to address these issues. Local roads are already busy enough and poorly maintained. I1</td>
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<tr>
<td>To be clear, I am objecting the each of the following site allocations:</td>
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<tr>
<td>I have no issue with the small number of houses proposed on 5 other sites around East and West Horsley where the number of houses is less than 15 on each site</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td>PSLPS16/5835</td>
<td>10844545 / Paul Cretney</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I also wish to object to A35, Wisley airfield. The building of a new town in this location is utterly inappropriate and would cause chaos in the local villages, aside from bringing the already busy A3 and M25 junction to a complete standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I also wish to object to A35, Wisley airfield. The building of a new town in this location is utterly inappropriate and would cause chaos in the local villages, put further strain in local amenities and increase the already congested A3 and M25 junction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Overall the proposed developments are wholly out of proportion with the existing villages and infrastructure and will destroy local communities, change irreversibly the character of the villages for which generations of local residents have chosen to settle here

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/11945</th>
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I object to the extension of the boundaries of the settlement areas of East and West Horsley. This would place both villages at risk of further unsustainable developments in the future

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11944</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the removal of East and West Horsley from the Green Belt. This would completely change the nature of both villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11863</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development sites in East and West Horsley on the grounds that the number of houses being proposed is far too excessive. The local amenities could not cope with such an increase. Local roads are already busy enough and poorly maintained, schools are over subscribed and doctor appointments are difficult enough to get already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2447  Respondent:  10844609 / Sam Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/4869  Respondent:  10844609 / Sam Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/4870</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4873  Respondent: 10844609 / Sam Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4874  Respondent: 10844609 / Sam Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10174  Respondent: 10844609 / Sam Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10175  Respondent: 10844609 / Sam Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10171  Respondent: 10844609 / Sam Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10172  Respondent: 10844609 / Sam Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/12  Respondent: 10844673 / James Purkiss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2. Taking an area out of the green belt to cater for GBC’s insane desire to concrete over the area is another example of the dirty tactics that are being used.

For heavens sake, will someone in the council drive down Tannery Lane and look at the roads you are proposing to dramatically increase the traffic on.

I would like to know if the current planning policy has been implemented simply to make it look like the planning department are doing something!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/170  Respondent: 10844673 / James Purkiss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A42 because there are too many homes being proposed for the existing infrastructure. The roads are already poorly maintained, narrow and in places dangerous. Increased traffic will be a burden and a hazard. Additionally I absolutely do not want to wantonly erode the green belt. It's there for a reason and it's disgusting you plan on destroying it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/171  Respondent: 10844673 / James Purkiss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to policy A43 because there is no need for traveller sites in the green belt.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Also 400 homes is an unreasonable burden for us to assume. Not to mention the fact it is a flood area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/172  Respondent: 10844673 / James Purkiss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I very strongly object to policy A58 because there is absolutely no need for more industrial sites in this residential area. What are the planners thinking? Are you just throwing things at a map? Slyfield caters sufficiently and I understand is not at capacity. Again the traffic implications seem to have been overlooked by the planners or ignored. Incompetent or negligent, I don't know.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/746  Respondent: 10844897 / H S Lofthouse  Agent:
I write to object most strongly to the inclusion of the Wisley Airfield in the local plan. We must protect our green belt and exclude this site from the draft local plan without delay. I have written previously to object, our country lanes cannot hold the considerable amount of traffic that would need to be accommodated, the A3 junctions would be even more clogged up than usual at rush hour, air pollution would suffer, the site is unsuitable for a housing development and would spoil the green belt and the protected area and its environs. The potential schools are not needed here. We are served by excellent schools already. This is the wrong area to consider. There are many other sites that could and indeed should be considered. Please start afresh. Take a step back and consider how detrimental this would be to our landscape. Why build on this agricultural land which should be retained as such, as was the original historical intention. There are sites off the M25 that could be considered, and outside Guildford, where much of the housing could be contained.

Please consider carefully all the objections you will receive from residents of this picturesque hamlet of Ockham - don't spoil our countryside in this way. Expand elsewhere but not her at Wisley - green open space enjoyed by so many is becoming a rarity. Conserve and preserve our green belt as was intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The application was rejected by GBC on hood ground last year when TFM should have been removed from the Local Plan. It is wrong to bring it back for consideration when it was turned down on so many grounds and for very good reasons.

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeoological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

Please consider all of the above and ensure that plans for a huge town in the most inappropriate location are again refused. There are many other parcels of land around that can be considered for housing which would not impact on a small community in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/516  Respondent: 10844929 / Maureen Wright  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt due to the following points:

The roads to this area are rural roads, single track for the most part, certainly not suitable for any more traffic, especially larger commercial vehicles. At one end it joins another rural road with a weak bridge in one direction and a very narrow junction in Ripley in the other.

Any more development in this area ruins the surrounding Green Belt land, which comprises open fields and the River Wey.

The original development is effectively and old non conforming user in an area of outstanding countryside, so shouldn't even be there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3811  Respondent: 10844929 / Maureen Wright  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A42 change at Clockbarn Nursery, Tannery Lane due to the following points:

The site has very restricted access along Tannery Lane which is single track for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical with 45 homes, so an increase of 33% is just ridiculous.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with traffic for 45 extra homes, so an increase is not going to work.

Planning consent has already been granted, rather unwise given the access problems, for 84 flats and a marina. The traffic for this development has not yet been added to the current traffic situation.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane, so an increase in homes just exacerbates the problem.

This change ignores hundreds of previous objections. These have been made by people who live locally, the people who know the area best, they should be listened to, not pushed to one side.

Surface water flooding will be increased with the original number of homes, additional homes will make the situation worse still.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3809  Respondent: 10844929 / Maureen Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 Garlicks Arch due to the following points.

There is no proven demand for plots to accommodate Travelling Showpeople.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt land. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. It constitutes over development. These further changes to the plan are not required.

It is an unsustainable location. It will undoubtedly cause traffic chaos on the minor surrounding roads. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, anyone who lives in these areas will confirm that this is the case. Substantially more vehicle movements will result in even more congestion and greater pollution. Residents and the environment will suffer as a result.
This area contains ancient woodland dating back to the 16th century, which should be preserved. There is no good reason to tamper with it.

This site is identified as being in a Flood Zone 2 and regularly floods during winter months.

This site contains land which is heavily contaminated by many years of shooting with lead shot.

Above all, the latest changes to this site have completely ignored the thousands of previous comments from residents (who know the area best of all) during the 2016 Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/3810</th>
<th>Respondent: 10844929 / Maureen Wright</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Burnt Common due to the following points:

There is no requirement for new industrial or warehouse space as there is availability at Slyfield and Guildford Industrial estates, developing in this way is pure stupidity and is just building for the sake of it.

Additionally, this site is in the Green Belt, there are no exceptional circumstances to justify development here.

According to the 2017 Employment Land Need Assessment there is a reduction in demand to 3.9 hectares for industrial land in the whole borough. Why is there a huge allocation of 10 hectares in Send? This policy has not been thought through at all.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

Any extra traffic would cause traffic chaos in the local area with its small roads, adding commercial vehicles to this would be completely unsustainable.

This site was deleted from the 2014 Local Plan due to previous objections, why has it returned?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/2967</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4093  Respondent: 10844993 / Simon Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Any more development in this area would surely constitute urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7663  Respondent: 10844993 / Simon Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create alot of additional pollution due to traffic.

Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A42 Clockbarn Nursery

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy A43 Garlicks Arch.

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of
development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

This proposal was never in the regulation 18 draft, and as such has never been consulted on, and was slipped into the Local Plan at the last minute.

This site is green belt comprising of woodland and meadows between the A3 and Send and Ripley. This site has a particular sensitivity since it is covered in ancient woodland, some trees date back to the 16th century.

It is permanently protected by the NPFF which prevents the merging of settlements, there are no exceptional circumstances to develop this land.

To destroy a natural boundary between the A3 and the villages would be incredibly damaging to them. The obvious increase in pollution caused by massive amounts of extra traffic would be hazardous to health of residents young and old of both Ripley and Send. The existing boundary also absorbs some noise and pollution from the A3 itself.

The proposed industrial development of 7000 sq m is simply not needed since the latest Employment Land Needs Assessment 2015 shows a reduction of 80% in required employment floorspace from the previous draft plan. Additionally GBC have not provided any evidence of a requirement for this. Basically this means that industrial space at Burntcommon is not required. Even if there was a requirement for 7000 sq m of industrial space it should be at Slyfield where there is already available space.

Furthermore, a new 4 way interchange onto the A3 at Burntcommon to serve this development would be disastrous for Send. Send Road A247 would become gridlocked all day, as it would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2000 houses at Wisley and the 2000 houses at Burpham. Send cannot take that amount of traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The additional north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

Generally transport evidence for this policy is incomplete and unreliable. What would happen in reality would be serious accidents, major traffic jams twice a day and therefore excessive pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7666  **Respondent:** 10844993 / Simon Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to policy A44 Send Hill.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.
GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

I feel contempt for Councillors of G.B.C. who are attempting to force developments that destroy Green Belt land in a cynical move and return the number of houses to far in excess of what is required. There is no need for any more housing on top of the 13,860 already proposed for the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12372 Respondent: 10844993 / Simon Wright Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Any more development in this area would surely constitute urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12371 Respondent: 10844993 / Simon Wright Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

This Local Plan seems to have been thrown together with no real thought, we need a ‘common sense’ Local Plan, not this rubbish.

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General points of objection:

GBC have not followed correct procedure. Since 2014 GBC has changed every major site in Send proposed for development and now has added a new massive road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Conclusion:

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

This Local Plan seems to have been thrown together with no real thought, we need a ‘common sense’ Local Plan, not this rubbish

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal to inset Send Business Park from the Green Belt due to the following points:

The roads to this area are rural roads, single track for the most part, certainly not suitable for any more traffic, especially larger commercial vehicles. At one end it joins another rural road with a weak bridge in one direction and a very narrow junction in Ripley in the other.

Any more development in this area ruins the surrounding Green Belt land, which comprises open fields and the River Wey.

The original development is effectively and old non conforming user in an area of outstanding countryside, so shouldn't even be there.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/5053  Respondent:  10845153 / Eileen Sherman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/4871  Respondent:  10845281 / Madeleine Severs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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Page 2705 of 3142
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2827  Respondent: 10845377 / Natasha Lock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farms Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
Pollution:

The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

Schools:

Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

There is talk of a new school at a site near to Lollesworth lane west Horsley, but this should have been talked about well before the local plan went out for consultation.

Medical facilities:

Already very difficult to get an appointment and the car park is always full.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6385  Respondent: 10845377 / Natasha Lock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TRAFFIC AND PARKING

Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

Local Road Network:

In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6390  Respondent: 10845377 / Natasha Lock  Agent:
**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Transport:**

Congestion on the roads and parking at the station ill be a challenge a ill trying to get on the train during peak times.

I strongly object the planned development of our villages and believe that a more up to date and sympathetic plan should be proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6381  **Respondent:** 10845377 / Natasha Lock  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

So far, no exceptional circumstances have been shown to build on Green belt land.

The Green Belt is there to stop neighbouring towns from merging. To stop the unrestricted growth of built up areas. It enables people/Families from the cities to have easy access to the countryside.

I believe this should be protected for generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6388  **Respondent:** 10845377 / Natasha Lock  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Loss of Green Belt land:

Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6382  Respondent: 10845377 / Natasha Lock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FLOODING

Being a resident of Heatherdene, West Horsley, our gardens flood every winter and whenever there is heavy rain

The field behind our house designated “Land near to Horsley Station and next to the railway” has been earmarked in the draft local plan for one hundred houses. A large percentage of this land is FLOOD ZONE 3. During the last winter this field was on Amber alert (imminent major flooding).

How can it be possible to consider a piece of land that floods all the surrounding gardens and floods that section of Ockham Road North with horrendous surface water? Commuters are constantly soaked as they walk along The Ockham Road towards the village by overflowing drains every time there is rain.

The proposed entrance is too near the Railway arch on Ockham rd north, where lorries travel frequently into the middle of the road to make sure the clear the underside of the bridge.

It is an accident waiting to happen, in the truest sense!

Recently in Fetcham, a development was built on a site that floods. Even though, specialist flood resistant foundations and drainage were installed, the site flooded, causing damage to the properties and rendering them unsellable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6383  Respondent: 10845377 / Natasha Lock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

THERE IS ENOUGH BROWNFIELD SITES AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/323  Respondent: 10845441 / Simon Charlton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FIELDS BEHIND SHALFORD VILLAGE HALL

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the Local Plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as "open spaces" there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung on the village.

The considerable traffic from a development would have to exit onto Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to:

- increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
- dangerous size vehicles manoeuvring in roads that has little or no pedestrian path way due to increased traffic
- lack of parking in the village for the present day users let alone if more were to be housed
- the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7289  Respondent: 10845537 / Chloe Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

and development at garlic arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16299  Respondent: 10845537 / Chloe Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1) all erosion of green belt
2) removal of villages from the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16300  Respondent: 10845537 / Chloe Moore  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1808  Respondent: 10845537 / Chloe Moore  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2612  Respondent: 10845569 / Stu Edwards  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to -

[...]

7) lack of immediate provision needed for new schools

8) lack of any immediate provision for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Response ID: PSLPA16/2611  Respondent: 10845569 / Stu Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to -

lack of evidence for housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Response ID: PSLPA16/3912  Respondent: 10845569 / Stu Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to:

- increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
- dangerous size vehicles manoeuvring in roads that has little or no pedestrian path way due to increased traffic
- lack of parking in the village for the present day users let alone if more were to be housed
- the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development at garlic arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

lack of parking in the village for the present day users let alone if more were to be housed
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increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10851  Respondent: 10845569 / Stu Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the use of countryside areas for which the area is so well known to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/390  Respondent: 10845569 / Stu Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] in Ripley I am Stewart Hornblow My youngest son is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and he objects to -

1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go
6) lack of evidence for housing numbers needed
7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery S
9) and development at garlic arch
10) increased traffic that would be cause in which a village such as Ripley already cannot sustain its current demand without long tailback and
11) dangerous size vehicals manoeuvring in roads that has little or no pedestrian path way due to increased traffic
12) lack of parking in the village for the present day users let alone if more were to be housed
13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/526  
**Respondent:** 10845569 / Stu Edwards  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to -

1) all erosion of green belt
2) removal of villages from the green belt
3) disproportionate amount of development in one area of the borough
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13) the use of countryside areas for which the area is so well know to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16304  
**Respondent:** 10845569 / Stu Edwards  
**Agent:**
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**Comment ID:** pslp172/4889  **Respondent:** 10845953 / Fiona Wallin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPS16/93  **Respondent:** 10846145 / Phillipa Bottomley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was very surprised to see the new development plan.

Having read the previous plan and having attended the meeting in April at Lancaster village hall, nothing had previously been mentioned about the two areas below:

Policy A 43 30 ha land at Garlick's Arch Burnt Common.
Whilst in principle it seems like a good idea to have both on and off access to the A3 at the Burnt Common roundabout, I am concerned about the effect it will have on the already congested local roads. We have massive lorries coming through Clandon (another problem) and now there would be even more, using this interchange from the M25/A3 to get to Woking. The road passing through Send is very congested for long periods during the day and this would only exacerbate the problem.

If we build houses but no offices, where do the people go to work? They all have to get in their cars to drive to work. Industrial units mean more big lorries on the narrow and already congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6928  Respondent: 10846145 / Phillipa Bottomley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whoever it may concern.

I am very concerned about the plans for Garlick's Arch and the associated increase in traffic on the roads.

Many of the surrounding roads are very narrow and we have had wing mirrors gone and sides of cars badly scratched.

Although the new entrance and exit onto the A3 sounds good I am concerned at the increase in lorries and cars this would generate going through the already very congested Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/94  Respondent: 10846145 / Phillipa Bottomley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A44. 1.9 ha Land West Ridge and Send Hill.

This area used to be a land fill waste site and there are currently vents in place which may be a concern for those that live in houses built on this site.

Send Hill is a very narrow road especially where it meets Potters Lane, where it is single lane, it then comes out onto a blind corner. Even an increase of 40 houses and 2 travellers sites would cause untold problems and danger.

I live on Potters Lane which since Sat nav has changed radically. We continue to get double-decker lorries and large trucks bombing along on a totally unsuitable road.

40 extra houses in Send Hill and 2 travellers site would only increase this even more.

Has research been carried out on the nearby roads?

How can GBC add these new developments so late in the day?

Whilst I understand that new houses do need to be built I object to both developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2568  Respondent: 10846145 / Phillipa Bottomley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because the increase in homes will worsen the chronic traffic conditions through Send and associated roads (as per my response to earlier draft Local Plans), and the impact on other services. This will be exacerbated if Policy A43 is also enacted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2569  Respondent: 10846145 / Phillipa Bottomley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A43 change at Garlick’s Arch because the scale of the development is inappropriate for local roads, schools and surgeries. This will have a significant impact on traffic through Send, Ripley and Clandon, and will have a material impact on local schools, access to medical services and the Woking trains. This development will connect Ripley to Send developing a single conurbation contrary to the aims of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2570  Respondent: 10846145 / Phillipa Bottomley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common and the change of “maximum” to “minimum” as there is no commercial case for such a development (reference empty units at Slyfield) and this change ignores all previous comments that caused its withdrawal from the 2014 draft. This development in conjunction with A42, A43 and the new interchange onto the A3 at Burntcommon all acting as a gateway in to Woking and the train system will blight the area to gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1005  Respondent: 10846145 / Phillipa Bottomley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because it is in an area of outstanding countryside adjacent to the beautiful Wey Navigation and is an inappropriate development in the Green Belt. The narrow country road system connecting Send Business Park to Send, Ripley and Woking is inadequate and will only be made worse by more development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1006  Respondent: 10846145 / Phillipa Bottomley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
I am supportive of local development and an increase in housing, but my principal concern with the Local Plan is that it treats each development separately without considering the impact of the cumulative effect of these developments on schools, roads, public transport, medical centres and hospitals.

I am also concerned that this process is being re-iterated with what appears to be little impact from earlier responses which makes me increasingly convinced that this is being undertaken to appear to take account of the views and insights of current residents rather than develop an integrated and sustainable development of our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/62</th>
<th>Respondent: 10846241 / John Ford</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the evidence submitted as it contradicts previous employment land needed (ref.ELNA 2015). Also the housing requirement has been exaggerated by wrongly inflated intake of foreign students. Additionally the green belt should not be utilised when there are brownfield sites available.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I suspect the legality of GBC's local plan when the Government and previously GBC itself have stated that there would be no development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/64  **Respondent:** 10846241 / John Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan strategy and sites as sound because of the contradictory nature of GBC's assessment of housing requirement in Send and Ripley in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/65  **Respondent:** 10846241 / John Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have no confidence in the current GBC's ability to carry out the wishes of the majority of residents of Send and Ripley. Their promises to protect the greenbelt have proven worthless. They have ignored the many petitions objecting to the proposed developments which appear to have not taken into account the affect on the infrastructure of our communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/45  **Respondent:** 10846241 / John Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send
I object to the proposal to inset Send Business Park from the Green Belt because it is an old non-conforming user on the lovely open Green Belt area adjacent to the Weymouth Navigation. The restricted access of Tannery Lane makes this proposal even more undesirable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/382  Respondent: 10846241 / John Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because despite the many objections made previously by local people the development has been increased by 33%. Obviously this will make worse the traffic problems in Tannery Lane and at the A247 junction.

In addition it will increase the Green Belt erosion, surface water flooding and spoil the views on the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/383  Respondent: 10846241 / John Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

I object to the Policy A43 change at Garlick Arch because again it has ignored the thousands of previous objections by local people. This proposal will also erode the Green Belt and no exceptional circumstances can be justified i.e. plots for travellers. The number of homes proposed is excessive and will cause an over-development of our village. It will cause increased flooding possibilities in a flood zone 2 area and cause further traffic congestion on the roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to Policy A58 at Burnt Common because it was taken out of the 2014 draft due to the number of previous objections. We do not require industrial development in this Green Belt area when Slyfield and Guildford have empty sites and industrial units. Further the 2017 Employment Land Need Assessment shows a reduction in demand for industrial land in this borough especially as the proposal indicates a minimum (not maximum as previously proposed) allocation of 10 hectares on Sends Green Belt. The proposal will create further traffic congestion on the narrow roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
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<th>10846401 / Karen Chizlett</th>
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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<thead>
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<th>Comment ID: PSLPP16/11993</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am emailing to object strongly to the revised local plan for Guildford.</td>
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<td>I still cannot believe that number of houses that are supposed to be built round here is so high. Why have we not been given the method of calculation of the figure? It seems incomprehensible that no-one in the Council has investigated this.</td>
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<td>Where are all the cars going go - roads are currently grid-locked on many occasions and things are only going to get worse.</td>
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<td>The whole plan seems to be totally ill-conceived, not properly consulted &amp; local residents are NOT listened to.</td>
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<td>I could go on &amp; on &amp; on...</td>
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<td>I realise that we need new houses and loads more affordable ones, but not on Green belt.</td>
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<td>Get a grip and do the right thing.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
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<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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</table>
Comment ID: PSLPA16/2895  Respondent: 10846497 / Malcolm Folley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Increasing the population of West Horsley by such vast numbers would eradicate the character and charm of what is – and should remain – a traditional village. This letter is to highlight my grave concerns for the future of West Horsley, its inhabitants and the environment.

The scale of this plan is unsustainable for a multitude of reasons:

* The infrastructure is already fraying at the edges. Our roads, through West Horsley and East Horsley, are congested at peak times of the day as commuter and school traffic has become significantly increased in recent years.

* The Raleigh School in West Horsley is full with no room on the site for expansion. The Howard of Effingham Secondary School, traditionally the school that children from West Horsley transfer to at the appropriate age, is also at maximum capacity.

* At school times, when parents deliver or collect their children from the Raleigh Primary School, or the preparatory schools, Glensk and Cranmore, it is not an exaggeration to describe East Lane, Ockham Road, Northcote Road, Northcote Crescent and Nightingale Crescent as chaotic. It does not bear thinking about how worse these roads would become in the event of an influx of housing on the scale being considered.

* Traffic increases from the proposed new housing estates will exacerbate an already critical overload of cars in the village.

* This congestion then spreads to all the adjacent roads. Furthermore, the state of these roads, and all others within the two villages, are narrow with poor or limited paving. In places, in West Horsley, there is barely room for two four-by-four vehicles to pass; and the presence of trucks, which are seen with greater frequency as our villages are used as cut-through between the A3/M25 and the A246 Guildford-Leatherhead road, causes traffic to slow to a halt. This is also placing pedestrians at risk.

* Also, there are several points in East Lane, in West Horsley, that are repeatedly flooded through the winter. In essence, the pressure on our roads and drainage is at a worryingly fraught level today.
*Parking is already an issue, too. The station car park, serving both villages, is almost full on most days from Monday-Friday. Parking at the three parades of shops is also regularly overloaded.

*The Horsley Medical Centre is operating at what appears to be maximum capacity – again parking to keep an appointment at the surgery is already a game of chance. Other issues are at play here. Like the Medical Centre, the schools have limited scope, or no scope at all, for building development and are at full capacity.

*To this end it is incumbent on the Local Plan that the unsatisfied demand for housing first needs to be established to be a genuine local demand for people born in the locality, or who need to live in the locality as a consequence of their local employment; or are existing residents needing to downsize or upsize.

*In West Horsley, we have watched a succession of smaller, and therefore ‘affordable’ properties, be granted planning permission by the Guildford Borough Council allowing them to be rebuilt into substantially larger, and therefore hugely more expensive homes. Where has the coherent thinking been behind that policy, I wonder?

*I wholly object to the unwritten expectation that all the villages on the A3 corridor will, sooner rather than later, become an urban sprawl linking this area to the suburbs of south west London.

*The importance of maintaining the Green Belt to prevent the urbanisation of Surrey’s rural communities, like West Horsley and East Horsley, is paramount. Our legacy should not be to leave behind a landscape to resemble a concrete jungle – which I fear will be the consequence of the scale of the proposal drawn up by Guildford Borough Council.

*If we are to protect the Green Belt for future generations we need to ensure it is only lost after strict examination against laid down criteria and after all suitable Brown Field are fully utilised.

*Our environment is attractive and of national importance for flora, fauna and geographical issues.

*Erosion of verges and ditches is already a threat caused by flooding and unusual weather patterns of late. The effect of concreting over the Green Belt land will further reduce the natural drainage system and drive water into existing drains that are already at risk of overflowing.

*Our concern about the Cayman Island registered company's promotion on the former Wisley Airfield will have unimaginable and irreversible consequences on all the villages surrounding the site, obviously including West Horsley.

A traditional village life has been maintained throughout our 33 years in residence with strong clubs and associations, as well as an abundance of local businesses, and producers of food local to the area.
There is limited employment within the Horsleys, and the bus service is one designed to meet the needs of ageing, rural community inhabitants; not those seeking to work in Guildford or Woking, for example. The rail service is already heavily used throughout the week – and the railway station is substantial distance from much of the housing in West Horsley.

It is the duty of our generation to maintain the natural beauty – and significant importance – of villages like West Horsley for the generations of the future. We think we are doing a decent job of that. After all, history has shown that the constructions of 1960’s style development of cheap housing created more problems in rural areas than it solved: rising crime, unemployment, and communities without a soul.

Once farmland has been commissioned for development, we have arrived at a point of no return.

This plan destroys the very essence of Surrey – so attractive not only to those of us living here in West Horsley, but for those that relish the chance to visit and enjoy the Green Belt that has been part of our heritage for a century.

I repeat: this Local Plan proposed by Guildford Borough Council is inappropriate and should be condemned for the damage and destruction that would be wreaked upon West Horsley killing a village that is vibrant, well-maintained and cherished by those who live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3482</th>
<th>Respondent: 10846625 / Frank Drennan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the dearth of the evidence base. The submission documents are unsound, unreliable and inconsistent.

1.2 I object to the way in which the current SHMA inflates the proposed housing figure, some examples of which are summarised below:

the failure to correct for errors in the historical data for international migration flows;

the failure to update the demand estimate in the light of the EU referendum vote. The ONS data supporting the SHMA makes it absolutely clear that the primary component of future housing demand is net international migration. The assumptions underpinning the calculations must be revisited following the decision for the UK to leave the EU;
the way it considers students and affordability, and:

the flaws in the method for estimating the number of homes needed to support job growth:

the treatment of vacant property

1.3 I object to the way in which the Green Belt and Countryside Study fails to value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

1.4 I object to GBC’s failure to evidence and articulate the exceptional circumstances required to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.5 I object to the use of Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6770  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 “Wisley” on the grounds that:

This constitutes a re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1.Green Belt location and absence of “exceptional circumstances”.

2.Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
1.1 **I object** to policy A42 “Clockbarn Nursery” on the grounds that;

1.2 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

1.3 The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

1.4 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

1.5 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

1.6 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6772  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **I object** to policy A43 “Garlick’s Arch” on the grounds that;

1.2 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided

1.3 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result

1.4 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

1.5 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area...
well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

1.6 I object to the proposal to build 7,000 sq.m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

1.7 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

1.8 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

1.9 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

1.10 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1.11 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

1.12 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

1.13 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1.14 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

1.15 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

1.16 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

1.17 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
1.18 Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

1.19 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

1.20 I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

1.21 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

1.22 It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6773  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

1.2 The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved and are already heavily loaded.

1.3 I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6774  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **I object** to policy A44 “Send Hill” on the grounds that;

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

1.4 The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

1.5 A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

1.6 The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

1.7 On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

1.8 GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

1.9 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

1.10 A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.

1.11 An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has “areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14457  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to Policy D1 “Making better places” on the grounds that;

1.2 The absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

1.3 The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14458  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to Policy D2 “Sustainable design, construction and energy” on the grounds that;

1.2 Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

1.3 This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about
preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

1.4 This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14459  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy D3 “Historic Environment” on the grounds that;

1.2 This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

1.3 This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

1.4 Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14460  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 **I object** to policy D4 “Development in urban areas and inset villages” on the grounds that;

1.2 This policy that does not address the opportunity for building in the urban area

1.3 The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

1.4 The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

1.5 This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

1.6 The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

1.7 All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14461  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1.1 **I object** to policy E1 “sustainable employment” on the grounds that;

1.2 There is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

1.3 The ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

1.4 The dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

1.5 That the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different
The supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.12 I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

1.13 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.14 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.15 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

1.16 I object to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy E2 “location for new employment floor space” on the grounds that;

1.2 I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

1.3 I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

1.4 The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

1.5 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

1.6 The ELNA 2015 calculated annual floor space demand is 0.7%.

1.7 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

1.8 There is currently 14% expansion space already available.

1.9 The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

1.10 The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

1.11 The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

1.12 Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

1.13 I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations

1.14 A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14467  Respondent: 10846625 / Frank Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to Policy E3 “maintaining employment capacity” on the ground that;

1.2 The ill-informed policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

1.3 That the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

1.4 Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

1.5 The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

1.6 To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

1.7 To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

1.8 London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

1.9 Guildford is in dire need of increasing town centre residential development.

1.10 The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I object to policy E4 “Surrey research Park” on the grounds that;

1.2 The expansion of the Research Park into a larger Business Park is completely unnecessary. The planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

1.3 That B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

1.4 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

1.5 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

1.6 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

1.7 Monitoring indicators should include new start-ups and new patents created

1.8 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

1.9 Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

1.10 I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

1.11 There is already granted consent to expand to a further 9,000 sq.m (14%) This space has been available for 10 years and is still to find a taker

1.12 The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

1.13 The ELNA 2015 calculated annual floor space demand is 0.7%

1.14 The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

1.15 The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

1.16 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14473  Respondent: 10846625 / Frank Drennan  Agent:
I object to policy E5 “Rural Economy” on the grounds that;

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq.m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy E6 “the leisure and visitor experience” on the grounds that;

The importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department
stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

1.4 Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

1.5 There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1.6 There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14477  Respondent: 10846625 / Frank Drennan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to Policy E7 “Guildford Town Centre” on the grounds that;

1.2 Policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

1.5 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive
heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.6 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tungate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.7 The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:

1. Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”

2. Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”

3. Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”

4. Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”

5. Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”

6. Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

1.8 Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

1.9 Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

1.10 Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

1.11 Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

1.12 Appendix 6 of the Retail Study indicates potentially inaccurate demand data

1.13 Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

1.14 The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland.
However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?

1.15 GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

1.16 Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

1.17 The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14478  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy E8 “District centres “on the grounds that;

1.2 The proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

1.3 This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

1.4 The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14479  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to Policy E9 “Local centres” on the grounds that;

1.2 (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14480  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy H1 “Homes for all” on the grounds that;

1.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

1.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

1.4 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.5 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy H2 “Affordable homes” on the grounds that;

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 I question the assumptions that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

1.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market. In addition the many additional homes will in themselves create an additional need for further affordable housing, creating an unsustainable feedback loop at the heart of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I object to policy H3 “Rural Exception Homes” on the grounds that;

1.2 This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

1.3 The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14489  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to policy I1 “Infrastructure and delivery” on the grounds that;

1.2 Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

1.3 The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

1.4 The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

1.5 Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.
1.6 This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

1.7 The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

1.8 The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

1.9 Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

1.10 Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

1.11 The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

1.12 It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

1.13 In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5..indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

1.14 The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.

1.15 Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

1.16 The following comments regarding the strategic sites are taken from the SHAR:
1.16.1 Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3)

1.16.2 Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/ B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

1.16.3 Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

1.16.4 Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

1.16.5 Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

1.16.6 Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.

1.16.7 Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

1.17 The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

1.18 The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan and consequently congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 **I object** to policy i2 “Supporting the Department of Transport’s Road Investment Strategy” on the grounds that;

1.2 This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

1.3 The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/14494</th>
<th>Respondent: 10846625 / Frank Drennan</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1.1 **I object** to policy I3 “Sustainable transport for new developments” on the grounds that;

1.2 This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

1.3 The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

1.4 The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

1.5 The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence
on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the
community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day, as I used to
do. They will not leave their cars for even part of their journey if it means longer travel times.

1.6 Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight
schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to
park in town.

1.7 The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. In
addition any vessel would have to negotiate a number of locks to travel any significant distance. Except on the tideway,
ot even the Thames has such services.

1.8 The addition of two new stations appears attractive but will slow down train journeys, which are already slower
than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out
or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I object to policy P1 “Surrey Hills Area of Outstanding National Beauty” on the grounds that;

1.2 This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

1.3 The wording of the Policy is unduly loose, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

1.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

1.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

1.6 In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, i.e. landscape character, scenic beauty, important views, tranquillity etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

1.7 I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14508  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 I object to Policy P2 “green belt” on the grounds that;

1.2 This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

1.3 The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

1.4 Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.5 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

1.6 As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

1.7 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are
included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

1.8 I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.9 This policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

1.10 To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1.11 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

- I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:
  - The land behind the schools including playing fields and woodland.
  - The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
  - Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14515  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1.1 **I object** to policy P3 “Countryside” (i.e. beyond the Green Belt) on the grounds that;

1.2 I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

1.3 This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

1.4 It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/14516  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 **I object** to policy P4 “Flood risk and water source protection zones” on the grounds that;

1.2 Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

1.3 This policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. This must continue.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPP16/14518  Respondent: 10846625 / Frank Drennan  Agent:
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>1.1 I object</strong> to policy P5 “Thames Basin Heath Special Protection Areas” on the grounds that;</td>
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<td><strong>1.2</strong> This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.</td>
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<td><strong>1.3</strong> SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>1.1 I object</strong> to policy S1 as stated and the presumption in favour of sustainable development on the grounds that;</td>
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<td><strong>1.2</strong> The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.</td>
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<td><strong>1.3</strong> The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.</td>
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<td><strong>1.4</strong> The most gaping hole in Policy S1 is its failure to protect the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice.</td>
</tr>
<tr>
<td><strong>1.5</strong> The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development.</td>
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<td><strong>1.6</strong> This policy also ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity.

1.4 I object to GBC adoption of an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.5 I object to the persistent confusion between housing demand and housing need which continues to distort the characterization of future housing development across the borough.

1.6 I object to the failure of Policy S1 to provide a meaningful definition of “sustainable development” or to set out any principles for applying sustainable development in practice to local planning decisions.

1.7 I object to GBC’s promise “to secure development that secures the economic, social and environmental conditions in the area” whilst omitting to recognise that economic growth, social justice and environmental protection often conflict.

1.8 I object to the failure of Policy S1 to say how each element of its sustainability promise is to be weighted or conflicts resolved. Under this policy, any development will qualify as sustainable, which makes a mockery of the NPPF’s most important guideline.

1.9 I object to GBC’s commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

1.10 I object to the way in which Policy S1 policy also ignores the majority of the 12 Core Planning Principles set out in NPPF paragraph 17.3

1.11 I object to GBC’s failure to apply constraints to housing need. The application of constraints is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities continue to do.
1.12  I object to the scale of the housing number proposed in this plan. The scale of GBC’s ambitions, which will be felt for decades into the future and irreversibly harm the local environment, demands that a high burden of proof on GBC to demonstrate that the plan is sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.13  I object to this local plan on the grounds that GBC has failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in GBC’s ownership and it would seem a practical and readily achievable alternative, much more acceptable to local residents.

1.14  I object to this local plan on the grounds that the proposed local plan relies on outdated thinking and practices. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1  I object to policy S2, on the grounds that;

1.2  GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.3  Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes and identified in their own SHMA that “it should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

1.4  Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.
1.5 In the current plan GBC have ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.6 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS (an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA)) has concluded that the OAN figure should be revised down from 693 homes per annum to **510 homes per annum**.

1.7 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.8 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

1.9 A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to **481** because:

- the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
- there should be no increase for affordability above basic demographic change.
- there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
- the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to this local plan on the grounds that key parts of the evidence are missing, flawed or based on withheld assumptions.

1.2 I object to this local plan on the grounds that i) the Strategic Housing Market Assessment overstates need, ii) that the Green Belt and Countryside Study uses a flawed approach and iii) that the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

1.3 I object to this local plan on the grounds that the Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” to justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

1.4 I object to this local plan on the grounds that the Sustainability Appraisal has lost sight of and is not compliant with the concept of Sustainable Development as described in the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1674  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment is deficient and biased in the range of alternatives it considers.

1.2 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

1.3 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
1.4 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too for the current decision process and leaves a crucial gap in the decision support information. Any decisions made in the absence of this crucial information will be deficient and unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1113  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design” as this deletion weakens the policy and will not contribute to making places better.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1108  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.4.23a which lacks sufficient detail for proper consultation and is completely inappropriate

I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1109  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1110  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

[One or more sections of this comment have been removed because they did not relate to a change to the plan.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

I object to the extension to the Research Park of over 10 hectares will be delivered. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the changes in Policy E7 Guildford Town Centre. There is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the needs of the greater number of lower income people attracted by the inevitable greater level of economic activity. GBC's approach is therefore not sustainable and will do nothing to meet the aspiration of its own policy.

With regards to the changes to this policy, I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.” This suggests that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.” The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10846625 / Frank Drennan</th>
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</table>
Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed changes to the plan will not satisfy the goal of the policy i.e. to deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in our community.

With reference to section 5.22 of the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017, the statement that "it is reasonable to consider that 40% of housing could be delivered as affordable for the purposes of following the advice set out in the PPG as above" is a clear example of wishful thinking on the part of those writing the report and is not supported by any evidence. On the contrary, experience shows that 40% is a wildly optimistic assumption and it is reasonable to expect that the council will struggle to get developers to agree to anything in excess of 20% at best.

It is also noted that section 5.20 of the above referenced report highlights that "The updated assessment indicates that 517 households per annum require support in meeting their housing need. This is higher than assessed in the 2015 SHMA, reflecting higher new household formation shown in the updated demographic analysis together with evidence that lower quartile rental growth has exceeded growth in incomes, meaning a higher proportion of households fall into affordable housing need". GBC offers no credible solution to this problem and instead will only exacerbate the issue by building a large number of homes catering to the relatively wealthy, and thereby creating further need for affordable housing to meet the needs of the greater number of lower income people attracted by the inevitable greater level of economic activity. GBC's approach is therefore not sustainable and will do nothing to meet the aspiration of its own policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1114  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4-way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.
I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1106  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

- It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation
- It has restricted access along Tannery Lane
- It should not be given the opportunity for further expansion or development

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24 km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”. This statement is false. GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside
- It is adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1107  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in policy P4 Flood risk and water source protection zones. Urban development on existing hardstanding does not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1095  Respondent: 10846625 / Frank Drennan  Agent:
A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to **400 homes per annum**. The 19 page report by NMSS, which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”, has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses. The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** pslp17q/175  **Respondent:** 10846625 / Frank Drennan  **Agent:**

The evidence base is deeply flawed, especially the GL Hearn SHMA. Independent analysis by Neil McDonald of NMSS demonstrates that the SHMA conclusions significantly overestimate future housing need in the HMA, especially within the Guildford area.

The 19 page report by NMSS (a copy of which is attached) shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.
The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Review of GL Hearn's Guildford Addendum to the West Surrey SHMA.pdf (1.2 MB)

The proposed changes to the plan are wholly unsound. As noted in my response to Question 1 the evidence base is at best flawed and at worst highly misleading, significantly overstating the OAN. The plan then compounds these foundational errors by failing to apply appropriate constraints taking due consideration of the need to protect the Green Belt. Further the plan fails to demonstrate any exceptional circumstances justifying the erosion of the Green Belt which would result from the plan's implementation. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I do not consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate. GBC's approach to the local plan process is characterised by frequent late changes to key elements of the plan, many of this are of dubious value. These changes undermine its duty to cooperate by deliberately introducing elements into its already deeply flawed plan that serve only to confuse, distract and undermine the earlier efforts of those objecting to its plans.

A prime example of this is the inclusion of the Wisley airfield site (policy A35). Following a huge public outcry, Guildford Planning Committee had unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. Policy A35 s, should be deleted from the plan for all the reasons the development was rejected by the Planning Committee.

GBC should revise its plan to take proper account of the many objections already made and cease adding new elements that only add further grounds for objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1381  **Respondent:** 10846945 / Sarah Jezard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objection to East Horsley local plan**

With reference to:

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<th>A39</th>
<th>Land near Horsley railway station, Ockham Road North, East Horsley</th>
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<td>Houses proposed</td>
<td>C100 (c3)</td>
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<tr>
<td>Location</td>
<td>Village</td>
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<tr>
<td>Ward</td>
<td>Clandon and Horsley</td>
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I have a number of concerns in relation to the proposed removal of Horsley from the green belt and site A39

- **There is no safe access to this proposed site.** The access proposed raises major Health & Safety issues. Even at present the close proximity of the railway bridge means access from driveways to Ockham Road North at this
point is restrictive & dangerous in normal hours. At peak commuting and school hours this is even worse and becomes very dangerous and accidents have happened at this point.

- **Local flooding is a major concern at this site** The proposed site builds on land which is at the moment acts as a flood plain curbing the issue which already exists about local flooding which doesn’t just occur with heavy downpours but also with light rain showers.
- At this point **Ockham Road North becomes dangerous** as it floods beyond the curb height and as such pedestrians and cars are put in danger.
- Many houses on Ockham Road North experience significant domestic flooding and this site will make them even more susceptible. The flood issue also has a major impact on domestic drainage and means that toilets, sinks and bath water backs up and becomes a health & safety issue. **This site will substantially increase the susceptibility of the local housing and infrastructure to the risk of flooding.**
- **False criteria for proposing to take Horsley from green belt** There is a lack of understanding of the area in relation to the description and therefore false criteria on which the draft has been proposed eg: The East vs West Horsley point above, the designation of Station parade is completely misleading and bears no resemblance to a few village shops and a small franchised convenience store and an infrastructure which can ill cope with existing residential need.
- **Infrastructure:** No-where in the plan has infrastructure been address. It is already an intolerably long wait to access the local GP’s and dentists at a base level.
- **Lanes:** There is no mention of the already inadequate lane; as they cannot in most situations be designated as roads, & footpath structure which are already inadequate and poor in struct.
- **Local employment is minimal** and the majority of the resident population have to travel to and from the village using either an already inadequate road/lane system or public transport and no additional car parking is planned which again is already limited.

Overall the proposal to take Horsley from the green belt and this proposed site does not take into account major flooding and infrastructure issues and as a consequence is at best not viable and at worst dangerous at a number of levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/440  **Respondent:** 10846945 / Sarah Jezard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see below a summary of a number of concerns which I have in relation to the proposed removal of site A40 from the green belt:

Firstly as the access is shown on the proposed the site is actually in East Horsley and not West Horsley. There is no safe access to this proposed site. The access proposed raises major Health & Safety issues. Even at present the close proximity of the railway bridge means access from driveways to Ockham Road North at this point is restrictive & dangerous in normal hours. This is exacerbated at peak hours of school and going & coming back from work times at which it becomes very dangerous and accidents have happened at this point. The proposed site builds on land which is at the moment curbing the issue which already exists about local flooding which doesn’t just occur with heavy downpours but also with light rain showers – example pictures are available. At this point Ockham Road North becomes dangerous as it floods beyond the curb height and as such pedestrians and cars are put in danger.
The flood issue also has a major impact on domestic drainage and means that toilets, sinks and bath water backs up and becomes a health & safety issue. This site will substantially increase the susceptibility of the local housing and infrastructure to the risk of flooding.

There is a lack of understanding of the area in relation to the description and therefore false criteria on which the draft has been proposed: The East vs West Horsley point above, the designation of Station parade is completely misleading and bears no resemblance to a few village shops and a small franchised convenience store and an infrastructure which can ill cope with existing residential need.

No-where in the plan has infrastructure been addressed. It is already an intolerably long wait to access the local GP’s and dentists at a base level. Nor is there any mention of the already inadequate road & pavement structure.

Local employment is minimal and the majority of the resident population have to travel to and from the village using either an already inadequate road system or public transport and no additional car parking which again is already limited.

Overall this proposed site does not take into account major flooding and infrastructure issues and as a consequence is at best not viable and at worst dangerous at a number of levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1.1 **I object** to the new Guildford Borough Council Transport Strategy 2017.

1.2 **I object** to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

1.3 If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

1.4 **I object** to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

1.5 **I object** to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2. Key parts of the evidence base are flawed or based on withheld assumptions.

3. The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

4. An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

5. Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

6. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

7. 38,357sqm of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

8. The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/ R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

9. “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

10. Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

11. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation
to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4032  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

1.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

1.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

1.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

1.7 I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

1.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

1.9 A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfills purposes 1, 3 and 5 very strongly.

1.4 The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

1.5 Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

1.6 The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

1.7 The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

1.8 The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

1.9 The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.1 I object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4035  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

22.1 I object to the changes to Policies A36 to A41 (East and West Horsley)

22.2 The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

22.3 Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

22.4 The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

22.5 No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal
approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

22.6 The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

22.7 The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

22.8 The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

22.9 Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

22.10 Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4036   Respondent: 10847521 / Andrew Procter   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changed policy A42 Clockbarn Nursery to 60 homes.

1.2 It ignores all the hundreds of previous objections made by local people

1.3 The increase to 60 homes in place of 45 homes is 33% more and too much.

1.4 It will worsen access and traffic problems in Tannery Lane and at the A247 junction.

1.5 It will make erosion of Green Belt in our village worse

1.6 It will make surface water flooding, which is already bad, even worse

1.7 It will impact open countryside views from the River Wey Navigation
1.8 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

1.9 The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

1.10 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.

1.11 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

1.12 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4037  Respondent: 10847521 / Andrew Procter  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

1.2 It ignores all the thousands of previous objections made by local people

1.3 There is no proven demand for travelling show people plots in this location

1.4 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.5 The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

1.6 This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

1.7 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

1.8 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport.
Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

1.9 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

1.10 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

1.11 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

1.12 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

1.13 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

1.14 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

1.15 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1.16 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

1.17 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

1.18 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1.19 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
1.20 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

1.21 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

1.22 Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

1.23 I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

1.24 I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

1.25 I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

1.26 It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 **I object** to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

1.2 This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

1.3 The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

1.4 There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

1.5 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

1.6 The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

1.7 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.8 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

1.9 The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.10 The impact on small surrounding roads will create traffic gridlock.

1.11 It will join up existing villages and defeat the purpose of the Green Belt.

1.12 The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

1.13 The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

1.14 The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

1.15 **I object** to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2142  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1  I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

1.2  There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2137  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1  I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2  I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

   • There is highly restricted vehicular access along Tannery Lane in both directions
   • It is effectively an old non-conforming user in an area of outstanding countryside
   • It is adjacent to the beautiful Wey Navigation
   • Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

1.3  I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.
• The impact on small surrounding roads will create traffic gridlock.

• The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt.

• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017.

• It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision.

• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units.

• There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

• It will join up existing villages and defeat the purpose of the Green Belt.

1.4 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

1.5 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.6 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.7 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

1.8 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.9 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.10 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.11 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions granted or evidence gathered by the economic development function at GBC and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.12 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
1.13 Little regard is still not given to the opportunity of specific B1 space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

1.14 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.15 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.16 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2138  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2139  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy.

1.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2140  Respondent: 10847521 / Andrew Procter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

1.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

1.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.7 Research parks that lose their way stop being the location of choice for new innovative enterprises.

1.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

1.9 Monitoring indicators should include new start-ups and new patents created.
1.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

1.11 The Surrey Research Park currently extends to 65,000 sq m.

1.12 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2141 **Respondent:** 10847521 / Andrew Procter **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1.1 **I object** to the changes in Policy E7 Guildford Town Centre.

1.2 I am of the opinion that policy E7 is **still very ill-informed** and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 **is still an aspirational voice from the past** and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till **2036 only another 19 years** for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

1.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

1.6 In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.
1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.

1.14 I object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.
1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

1.16 I object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/ 7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 **I object** to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 **I object** to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

1.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

1.4 **I support** higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1.5 **I object** to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

1.6 The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.7 **I object** to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

1.8 **I object** in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

1.9 **I object** to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.</th>
</tr>
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<tbody>
<tr>
<td>1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.</td>
</tr>
<tr>
<td>1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.</td>
</tr>
<tr>
<td>1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.</td>
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<tr>
<td>1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1.1 I object to the change in policy H3 Rural Exception Homes. |
| 1.2 I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).” |
| 1.3 This demonstrates GBC’s disregard for local housing need. |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2135  Respondent: 10847521 / Andrew Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

1.3 I object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that:

1.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

1.5 It has restricted access along Tannery Lane

1.6 It should not be given the opportunity for further expansion or development

1.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

1.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
1.10 **I object** to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

1.11 This statement is untrue as GBC is **proposing** to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

1.12 **I object** to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

1.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

1.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.15 Send is a good example of villages that **should not be removed** from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

1.16 **I object** to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

1.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2125</th>
<th>Respondent:</th>
<th>10847521 / Andrew Procter</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.1 I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

1.2 I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2129  Respondent: 10847521 / Andrew Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.1 I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

1.2 I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 I formally request the opportunity to give evidence in person at the Public Inquiry currently planned for 2018 in relation to my objections in 2016 and 2017.

1.5 I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

1.6 I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

1.7 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.8 70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate.
1.9 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.10 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.

1.11 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappo"nting that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.12 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.13 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.14 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.15 In my opinion much of the updated local plan still appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.16 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.17 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is **28.9 ha**. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated **9.26 ha**. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.18 I regret that my conclusion is that this plan is a clear example of bad planning.

6.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build **12,426 homes** based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

6.2 The OAN “objectively assessed need” figure of 12,426 is far too high

6.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be
sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. 1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

6.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

6.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

6.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

6.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

6.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

6.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

6.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

6.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

6.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

6.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.
6.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

6.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

6.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

6.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

6.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

6.20 House of Commons Briefing Paper; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

6.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

6.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

6.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

6.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/398</th>
<th>Respondent:</th>
<th>10847521 / Andrew Procter</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way costs doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

1.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

1.7 Under this amended policy it is clear that the OAN should be constrained.

1.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

1.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. 1.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.
1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3427  Respondent: 10847585 / Sean Meharg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Land to the South of Normandy and North of Flexford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3428  Respondent: 10847585 / Sean Meharg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land to East of The Paddocks, Flexford

I object to the above two sites because, apart from being green belt land that should continue to be protected, they are entirely unsuited for development, for the following reasons:

1. Both are subject to flooding, which would be obvious to anyone who has visited the sites, particularly after heavy rain. I regularly walk along FP361 (through Site A46) and FP375 (through Site A47). Any measures adopted to prevent flooding of the proposed new developments would simply cause the flooding risk to be moved to other locations, including my property.
2. The infrastructure of the area cannot cope with the current situation, never mind with the extra pressures from an additional 1100+ homes and a school, as witnessed by anyone who is familiar with the village:
3. Regular power outages.
4. Flooding from existing sewers at times of high rainfall.
5. Subsidence of existing roads, including the collapse of manholes.
6. Narrow roads, with hazardous 90 degree bends (on Westwood Lane leading to Wanborough and at the Glaziers Lane/Flexford Road junction) that are already the scene of several accidents.
7. Inadequate lighting on existing roads. These developments would result in even more dangerous conditions for both drivers and pedestrians.

8. Restrictions at the existing railway crossings:

9. Single lane traffic only at the Westwood Lane underbridge, with a height restriction stopping large vehicles from using that route.

10. Settlement behind abutments at Glaziers Lane overbridge (probably as a result of large vehicles being unable to use the Westwood Lane underbridge), with hazardous, blind approaches set at an angle to the road alignment.

11. Traffic congestion at the top of Wanborough Hill and junctions with the A31 sliproads resulting in long delays, whether leaving or approaching the area.

12. Traffic congestion tailing back along the A323 Guildford Road, sometimes from as far away as the level crossing at Ash railway station. This can be particularly severe, in the event of an accident on the A31.

13. Specifically applicable to Site A46, where there is currently no need for a school within the Normandy area. The adjacent schools, at Ash Manor School in Ash and Kings College in Park Barn are both currently under-subscribed and, should the situation change at some point in the future, have expansion capacity within their existing sites.

14. Ecologically, I do not feel the need to reiterate how these developments would affect the local environment, as other residents, with more detailed knowledge than I, will be able to put forward a much better case, other than to say that I specifically moved to Normandy because of its rural surroundings and access to green field walks.

Finally, it would appear that little or no research was carried out to establish whether these sites were really appropriate for development. I would therefore urge you to look again at their suitability and reject these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having studied the changes made to the Local Plan that effect my village (Normandy), I would like to make the following comments:

1. I am pleased that both Sites A46 and A47 have now been removed from the local plan and that you have taken heed of my objections, on the grounds of poor infrastructure, flood risk to existing properties etc. etc.
2. However, I am still concerned that it is proposed that Site A49 (Land to the Rear of Palm House Nurseries), which is behind my property, is to be removed from the Green Belt. In September 2014, I wrote giving my objections and they still remain. This is an extract from my email of 21st Sep 2014: “Site 91 – Land rear of Palm Nurseries, Normandy: The current planning conditions state this should be reinstated to its previous Greenfield condition and this should be enforced. If it is not, it will set a precedence to develop any other plots without following normal planning procedures. The lane leading to the plot is totally unsuitable for any kind of development.” If planning officers let this go through, it means that Green Belt status is meaningless, allowing anyone who takes possession of a Green Belt site to develop it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A43 Land at Garlick Arch, Send, Send Marsh/Burnt Common and Ripley

This proposed development of 400 homes and an industrial estate is too large for the area. Admittedly part of the site is a Brown Field site already developed for commercial uses. However the local infrastructure will be unable to cope with the large amount of traffic generated (possibly 1000 vehicles). The suggested new slip road onto the A3 northbound would help to stop vehicles going through Ripley Village. However take a look at the A3 northbound on a Monday morning during the peak time (during term time) and you will see that the traffic is stationary back to Burnt Common, therefore people will still go through Ripley Village to queue jump and that will cause a traffic jam there.

The Greenbelt was created to protect rural communities and to stop urban sprawl. The villages in Guildford Borough need this protection and therefore any plans to erode the Green Belt must be abandoned.

The proposals outlined in the Local Plan do not state how the Borough intends to address the education, health, pollution, and public transport problems that the increase in the population in the area will cause.

To sum it up we feel the number of houses proposed throughout the entire borough is far too large. The erosion of the Green Belt should not be allowed. The increase of vehicles on the roads will increase the pollution in the area adding to health problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8005  **Respondent:** 10847713 / Gillian Cox  **Agent:**

The local roads in the Guildford Area are already at capacity, especially the A3 and need major work on them to keep the traffic flowing. This should be the Council's priority before any new developments are envisaged. Any new developments in the Ripley, Burpham, Send and Wisley areas will result in the A3 becoming totally clogged (even with the suggested new slip roads at Burnt Common and Railway Station at Merrow) and vehicles being unable to move in peak times which will have a knock-on effect for local businesses and freight companies losing money because of delays. The frustrated drivers will then decide to avoid the A3 and take to the declassified roads which are not designed for high levels of traffic. Remember for every house built there will be on average 2 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
School

The case to build a secondary school at this location is not proven in fact the opposite is true. My understanding is, Ash Manor and King's College in Surrey are undersubscribed. It will be the proposed housing that is driving the need not the other way round.

Does an unneeded school in this area provide enough "exceptional circumstance" to remove our land from the metropolitan green belt? It should be built elsewhere in the borough where the need already exists.

Traffic

The railway bridge immediately outside my property is already a dangerous nightmare with the oncoming traffic blind spot. With this new proposed development where even a small estimate will generate 1500 cars let alone extra traffic drawn here for the proposed school and shops.

The bridge is only single vehicle access and will cause traffic at either side of the road to get through.

The junction at the A323 at Westwood Lane and Glaziers Lane is already difficult to turn right and the additional proposed traffic makes it unsustainable.

Glaziers Lane is an unclassified road (D60) and Westwood Lane and Wanborough Hill are only C16 classified road, therefore the roads are not up to handling the additional expected traffic.

Rural environment

This proposal will increase Normandy population by 100% ripping apart the 'ruralness' of our village and changing its character and makeup.

I hope you take note of the wishes of the majority of the village and reconsider these proposals. Please do not underestimate the power of the people in Normandy and mistake it as an easy and soft target to just build a 'new town' here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the proposal in the Local Plan to build a significant development at Blackwell Farm on the Hogs Back.

Despite the proposed additions to infrastructure, I feel this would simply be adding to the existing problem of too many people needing to travel into Guildford or along the A3 from that area. The road system cannot cope with the current level of traffic, let alone with an additional 4,000 homes, some of which will no doubt have 2 cars rather than one.

We have seen from previous developments that many people won’t use public transport even if more buses or trains are available – they prefer the convenience and greater reliability of driving. They are even less likely to walk or cycle – as anyone who has been passing a primary school at about 3.30pm will tell you.

The beautiful view of the Hogs Back from the A31 is one of the most attractive routes into Guildford and appreciated by visitors and regular commuters alike. Sadly this will be lost if there is a massive new development of housing, offices, a school and various other buildings. This does not fit well with our policy of protecting Guildford’s character as a Surrey Hills market town surrounded by countryside and of promoting tourism.

Such a scale of building on countryside will also inevitably have a detrimental impact on wildlife. Once destroyed the natural environment cannot be recovered.

The loss of the fields and paths of Blackwell Farm will also reduce the green space available for dog walkers, ramblers and other people enjoying the outdoors. The government are constantly promoting exercise and interaction with nature as being good for our health, but to support that we need to maintain access to suitable places to walk rather than build on them.

There were so many objections to this proposal at the initial stage and I am disappointed to see that it remains in the Local Plan despite widespread concerns.

I would also like to object to the plan to build 100 homes next to the cathedral on Alresford Road. This is currently an important wildlife corridor with a wide stretch of established hedge and open land, packed with birds and other native wildlife. If this becomes pavement, flats and parking as proposed, wildlife will inevitably be affected.

Alresford Road and Ridgemount also form a well-used safe walking route from the university and Onslow Village into town, which avoids the busy main road with all its traffic fumes. We want to encourage people to walk into town where possible rather than drive, and changing this route into another busy road by adding 100 additional homes will deter people from doing this. Currently it is quiet enough and safe enough for people to walk in the road, avoiding the narrow pot-holed pavement, but this will not be possible with a huge increase in traffic.

Having the cathedral positioned in the middle of a housing estate is also not great for tourism. It is attractively set amongst green fields at the moment, making it a popular venue for all sorts of activities.

I appreciate that the council is under pressure from the government to squeeze a huge number of extra homes into the borough, and the Planning team have my sympathy with their difficult task, but we residents are relying on you to protect our town from over-development and to prevent the loss of important areas of green space. If we continue to build more and more, Guildford will expand further and further until it loses its character and becomes a sprawling metropolis.

I hope you will reconsider the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to you to strongly voice my objections to the huge and completely inappropriate development proposed in Ripley and send (Garlicks arch and burnt common) and Send hill.

As a resident of Send village I would like my objection to be seen by the planning inspector.

I am completely shocked and appalled that it appears Guildford borough council are underhandedly trying to push this through and attempting to remove Send village from the green belt altogether.

I was of the impression that the Government attaches great importance to Green Belts and that it had stayed a commitment for green belt protection. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their PERMANENCE! Send provides a buffer between Guildford and Woking. Removing Send from the green belt simply cannot happen, the green belt was put in place when our government had the foresight that one day we might need to be forced to protect our green open spaces from our future selves and they were right to do it.

It’s where we relax. It’s where we watch wildlife. It’s where we take part in our hobbies. It’s where we eat and drink. It’s essential for our local wildlife and the health and well being of the local residents. We must protect it. It is a slippery slope if we start to bend the rules here and there just because there are housing targets to meet. We should all think of the future of these areas for our children and our grandchildren and for generations to come.
I object to the fact that Guildford borough council have not followed the correct process of another full consultation for these proposed developments, under regulations 18 this is required. These regulations are in place for a reason. Why is it that guildford borough council do not feel they have to follow correct procedure? The trust of the local community has been shaken by their blatant attempt to cheat the system to achieve their goals with no consideration for the effect this would have on the beauty and quaintness of our country village.

I also object on the basis that Guildford borough council also seem to have fabricated their evidence in an attempt to justify these plans. The evidence they have provided is inaccurate and therefore cannot be used to justify these plans. I urge you to read the 2015 ELNA assessment which shows an 80% reduction meaning the industrial space at burnt common is not needed anymore.

**Guildford borough council should be using brownfield sites to help tackle the housing crisis. They should not be re-classifying green belt to skirt around the rules and regulations.**

I object to the planned development at Send hill and Winds ridge and also the traveler site that has been proposed. This was NOT included in regulation 18 draft and has NOT been consulted on previously. This is a quaint peaceful area that will be ruined and destroyed by either of these things. Send Hill is an important part of our local countryside, with open grass areas with wild flowers and bee orchids essential to the survival of local insects, especially bees which are at serious risk if we don't make a commitment to saving these areas.

A traveler site is not appropriate for this area. I work in Epsom and regularly see areas where travellers live and settle and they are completely destroyed. Not to mention the increased risk of crime that ultimately comes with having travellers living in the area. I speak from personal experience. Even if you discount all these reasons, this is inappropriate simply due to the narrow width single track country road.

I objects to Send being removed from the green belt.

I object to policy A 43. 30 land at garlicks arch, burnt common proposed housing as there is no need for any more houses on top of the 13,860 already proposed for the borough. This site is new and was not included in the regulation 18 draft and has NOT been consulted on previously. This is green belt protected by the NPPF. There is no reason to justify this whatsoever.

If there is a shortage of living space in this area I would suggest Guildford Borough Council allow planning permission to existing residents to extent their dwelling where necessary and possible. They are renowned for objecting to planning application for even basic extension work. Yet they now feel it's appropriate to destroy our countryside and village with these proposals.

My husband and I had a planning application refused and one of the main points quoted for this refusal was that "it would have a harmful impact on the host property and character of the local area. As such, the proposal would be contrary to policies H9, G5 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007) and Supplementary Planning Guidance 2003: Residential Extensions." How can Guildford borough council possibly justify these huge proposed developments and changes that threaten to destroy the identity of our villages, zone vast areas of green belt land for development and cause huge problems with our local roads.

Please do not let this happen to our beautiful countryside, local wildlife and quaint English villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements for the Plan. There is no schedule for Garlick’s Arch so the Plan takes no account of the infrastructure required for this site.

Furthermore the development at Garlick’s Arch would result in the loss of four successful existing rural businesses, which have been for there many years employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/871  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

Garlick’s Arch is within the Green Belt. There are no exceptional circumstances which allow for its removal. Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land. Why have GBC removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch?

Garlick’s Arch is not appropriate because:

- There is no transport infrastructure.
- There are no plans to improve local schools, medical or utilities to cope with the increased needs these new homes
- The site is liable to flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/872  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
10. I object to the employment strategy and impact at Garlick’s Arch

There is no need for new industrial sites at Garlick’s Arch. There is an existing brownfield industrial site at Burnt Common that could easily house the 7,000 sq m proposed. Why was this site was removed from the Plan without any reason?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/870  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

Ramps to the A3 at Burnt Common would be a disaster for the local population, who do need to access the A3 to the north, but the addition of ramps will draw in a huge amount of ‘through’ traffic. e.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as these roads cannot be improved. The queues during the rush hours are such that it already brings gridlock to the local area. Encouraging more traffic to use these roads would be untenable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1775  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. I object to the damage to the historic environment as a result of the scale of the proposed development

The Garlick’s Arch proposal would double the built-up area in the locality, and would irrevocably damage the trees on the site, which includes over 80 ancient Oaks. Once these historic environments are destroyed they cannot be replaced and should be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1778  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to the lack of proper infrastructure planning for sites

The Plan does not identify adequate infrastructure improvements to support the scale of development, especially at Garlick’s Arch which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors, hospitals etc. are already at capacity. It is already extremely difficult to get a GP appointment in the local surgeries without a long wait.

Are there plans to improve the capability of the emergency services, police, ambulance, fire brigade to cover the extra houses in the north east of the borough?

I wish my objections to be taken into consideration and that the Plan is amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1772  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plans for improvements. You cannot squeeze modern traffic down lanes that were built for a horse and cart.

The rural roads in this area are narrow, in poor condition and have no pedestrian footpaths. The new homes will generate dangerous and unsustainable traffic. The historic village of Ripley was given a by-pass to save it for future generations not make its roads into a car park.

Every time there is a problem on the A3/M25 traffic already congests the area to dangerous levels. With the increasing cycle traffic on the Olympic cycle route to the Surrey Hills using the same narrow lanes, this is a recipe for a human disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1777  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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13. I object due to the congestion that development will cause to the trunk roads, A3/M25

The A3 and M25 would need to be improved before any development can be considered. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no enhancements are possible in the timeframe of this Plan so the developments at Wisley Airfield, Garlick’s Arch and Gosden Hill should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1776  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9. I object to poor air/noise quality concerns

The developments being proposed, particularly in the north east of the borough, will lead to increased congestion and to
greater levels of air/noise pollution, which will have a detrimental effect on local residents and their health and wellbeing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1771</th>
<th>Respondent: 10848513 / Martin Cole</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to not protecting the Green Belt

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield and Garlick’s Arch and the subsequent urban sprawl. The whole beauty and character of the area are the individual villages. There are no exceptional circumstances for these villages being removed, as required by the National Planning Policy.

There is a suitable brownfield site at Burnt Common that should be developed rather than developing Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1773</th>
<th>Respondent: 10848513 / Martin Cole</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch is classified by the Environment Agency as being in a greater risk than the Council’s own assessment. I have witnessed flooding many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

My objections are as follows:

1. **I object to the Local Plan as the proposed developments are not sustainable**

   The proposed 13,850+ new homes in this tiny area are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. There is no public transport to speak of, only the occasional bus service which has already been cut back. Wisley Airfield and Garlick’s Arch have no railway stations, so almost every adult will have to drive their own car. It is already difficult to cross main roads as a pedestrian; more traffic will make it impossible and extremely dangerous.

   The development should be in more urban areas where there is sustainable transport.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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**Comment ID:** PSLPP16/1774  **Respondent:** 10848513 / Martin Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. **I object to the Borough Wide Strategy**

   There is too much development in the north east of the borough (Wisley, Ripley/Send and Clandon). Why is 36% of the entire Plan’s new housing proposed in this tiny area? Why are other areas not being proposed?
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation with the loss of village identities. I was always under the impression it was Council policy to keep each village separate and retain their individuality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10848513 / Martin Cole</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Increasing the size of Site A35 – Former Wisely airfield. The sheer volume of traffic using our High Street and local single track lanes will cause further intolerable congestion and pollution. More and more cyclist use these routes and increasing traffic will create accident black spots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/153</th>
<th>Respondent: 10848513 / Martin Cole</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. There are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network. Every day there are jams and problems on the local roads and this is only going to intensify with more and heavier traffic. More houses means yet more pressure on already stretched local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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</table>
Please find below my objections to the Revised Local Plan:

• The development at Site A43 Garlicks Arch would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation.
• The potential of an increase from a minimum 400 houses up to a possible 650 at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause merger of these villages. Villages should remain individual and not be merged into one huge conurbation. Local facilities, doctors, schools etc. cannot cope with this increase. Have you tried getting an appointment with a GP recently.
• Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
• Including six Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural area within the Green Belt and there is no identified need within the Local Plan. The allocation of six Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and therefore is out of scale with the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/151  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt. What has Ripley/Send done to deserve this unfair distribution?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/152  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
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<tr>
<th>Comment ID: PSLPA16/3296</th>
<th>Respondent: 10848577 / Jen Dunbar</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

- The potential for a substantial increase in industrial floor space from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with sufficient information for a full and proper consultation given the ambiguity and lack of detail within the document. Also the increase in heavy traffic is unmanageable within the local roads and lanes
- The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.4.23a and does not allow for full and proper consultation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<tr>
<th>Comment ID: PSLPS16/6439</th>
<th>Respondent: 10848577 / Jen Dunbar</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to Send Village being removed from the Green Belt. The National Planning Policy Framework required this status to be permanent. There are no special circumstances which justify altering this. Local councillors and central government gave a clear election promise to protect the Green Belt. We, the electorate, expect those promises to be upheld.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the building of 45 houses at Clockbarn Nursery. Tannery Lane is narrow and gives inadequate access for the significant traffic volume which this will bring. The junction with Send Road is already dangerous and a dramatic increase in traffic will make it more so. Permission has already been granted for 64 apartments at the Tannery and for building the Marina so traffic is already set to increase, but the area will not be able to cope with the further increase. Pollution and noise will increase, and this will have a negative impact on residents and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6440  Respondent: 10848577 / Jen Dunbar  Agent: |
|--------------------------|------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the building of 400 houses and 7000sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. The site is covered in ancient woodland which is home to many animals and birds which would be impacted by the destruction of the woodland. The industrial space could be accommodate instead at Slyfield which would avoid the destruction of ancient woodland. Guildford's housing needs could be met by the proper use of brownfield sites, thereby preserving the Green Belt and upholding election promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6442  Respondent: 10848577 / Jen Dunbar  Agent: |
|--------------------------|------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send is already congested and any increase in traffic would cause gridlock and cause significant increase in pollution and noise which would negatively affect residents and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10848577 / Jen Dunbar</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the development of 40 houses and 2 travellers' pitches at Send Hill. There is a narrow country road providing access to the site which would become very congested. The subsoil of the proposed site contains documented unsafe landfill waste registered at Guildford Borough Council. Development there would destroy a high amenity area set in beautiful countryside. It would also disrupt or destroy habitats for local wildlife.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Residents of Send are concerned about the road safety issues, congestion, pollution, noise, destruction of wildlife habitats and disruption of village life which the planned developments will bring.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/260</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I object to the lack of evidence for the alleged housing need numbers. In previous versions of the draft it was explicitly stated that a significant factor in the demand for housing was the national requirement to make provision for migrants. Given the recent EU referendum result, it is almost certain that the migrant numbers anticipated will be very significantly lower than at present and thus it is rash to go ahead with a Local Plan based on housing need numbers that will drop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/808  Respondent: 10848705 / John Woodcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of provision for Doctors’ Surgeries. The existing Surgeries are already full and quick appointments or consultations are very difficult if not impossible to arrange, even for the very ill. Adding more demand without more provision is reckless and risks serious damage to residents’ health and well-being.

2. I object to the lack of immediate provision for new schools. We live in an affluent area of a relatively affluent Country. We should be educating our children to the highest standards and we need to make school as inclusive to all as possible. Over-crowded schools are a catalyst for unrest and lead to disenfranchised and disenchanted children, with undue pressure on over-worked teaching staff and a knock-on negative effect on families and communities. We need to make more places available, not “shoe-horn” more children into the same schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/806  Respondent: 10848705 / John Woodcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to all erosion of the Green Belt. It is essential that we contain urban sprawl and there is plenty of evidence that we have considerable ‘brownfield’ land on which to build.

2. I object to any “in-setting” of any villages from the Green Belt, mostly for the same reasons as above, but also because any proposed development should be tested very vigorously against the character of the area and the absolute necessity to keep green spaces between our towns and villages; they preserve quality of life and provide an essential eco-system which promotes peoples’ health and welfare.
1. I object to the disproportionate amount of development on one area of the borough. In previous drafts of the plan, development areas were spread more evenly, whereas this draft enables planners to go ahead with proposed strategic sites totalling nearly 7,000 homes in a relatively small area in or around Ripley and the Lovelace area. None of the proposals so far put forward make any serious effort to address the infrastructure issues. Roads are already clogged, not just at peak times and the many thousands of extra vehicles which these developments will generate cannot be supported without significant new infrastructure.

2. I object to the limited consultation period. In previous drafts of the plan, there was time for communities to review, discuss, query and respond properly to the plan, whereas, the “unseemly” haste within this latest draft is unacceptable.

2. I object to last minute inclusion of new sites with less than two weeks notice. My reasons are as in 4 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/279</th>
<th>Respondent: 10848865 / Anne Marie Lee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am absolutely appalled to hear that in certain areas of Horsley that the green belt has already been changed, once this has happened and carries on our green and wonderful land will be lost forever.

I am totally against any encroachment on the green belt.

I was at the meeting held in your offices about the Wisley Airfield when it was completely outed I now see it has again been included in the plan. It is ridiculous in so many ways and would completely ruin this area forever, for a start the amount of traffic and the roads would be impossible.

The nearest station car parks are already filled to capacity. This is just a total profit making idea for a few people who live in The caymen Islands with no care about the residents who live here and what about you the council? I would have thought it was your duty to protect the local people who by the way pay a lot of money in council tax.

I a resident who lives in Old Lane am really annoyed this has been allowed to carry on and take time money and energy from the council.

I reiterate I would like to know exactly who these people are in the Caymen Islands as they seem to have an agent acting for them I think we should have a right to know.

I feel very strongly about any green belt loss and will oppose it with all my stength.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2229</th>
<th>Respondent: 10848929 / Mark Grainger</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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</table>
I object to A37, A38, A40, A41

The proposed amount of new houses far exceeds the existing infrastructure.

I moved to west horsley for the rural village feel and that will be destroyed, with amount of new houses proposed.

Houses already take a while to sell, so I don't believe the demand warrants your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9427  Respondent: 10848929 / Mark Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to policy P2 (green belt)

This is an extremely important asset to the public and goes against protecting it. The impact on flooding, natural resources, wildlife, leisure and health has been ignored.

There appears to be an unreasonable amount of development proposed for the green belt in areas of west and east horsley, which in my opinion will do more harm than good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/122  Respondent: 10848993 / Steve Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

I object to policy P2 (green belt)

This is an extremely important asset to the public and goes against protecting it. The impact on flooding, natural resources, wildlife, leisure and health has been ignored.

There appears to be an unreasonable amount of development proposed for the green belt in areas of west and east horsley, which in my opinion will do more harm than good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I inherited the green belt, I am therefore responsible for my children, their children and great great grandchildren to also inherit this precious land, I also vote people in to council who will also look after our inheritance, if promises are to be broken that is not a democracy. The building on green belt is not necessary or needed as there are local brown belt sites which can be used.

The site at Garlicks Arch is a prime example of cutting down trees, destroying the habitat and rising more flood to Send Marsh, having spent money to prevent this.

The term affordable is incorrect as proved as White Hart Court, Ripley the prices were not negotiated before planning consent was given and put them out of the reach of the majority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/144  **Respondent:** 10849377 / Vickie Leonard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any immediate provision for doctors surgeries

I object to the lack of any immediate provision for car parking as the villages suffers now so this will be unbearable!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/143  **Respondent:** 10849377 / Vickie Leonard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/197</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<tr>
<td>I object to site A43 Garkicks Arch</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to site A43a the on and off ramp at Clandon, this will only increase traffic in the village not help us at all.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the A45 The Talbot as this is overdevelopment in a conservation area.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I object to site A57 The Paddocks as this is unlawful</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I would like to strongly object to the 2016 draft local plan. I live in Ripley High street and over the last 4 years have already seen allot of change to what was a lovely village and this has already gone downhill with all the permitted development and the local plan will only make matters worse in my eyes.</td>
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<td>I would like to object to many points as follows:</td>
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<tr>
<td>I object to all erosion of the greenbelt</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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<td><strong>Document:</strong></td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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</tbody>
</table>
I object to any in-setting, removal of any villages from the Green Belt, that’s what we have brought into and should remain in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/410  Respondent: 10849377 / Vickie Leonard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the borough, we have had enough done our bit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/183  Respondent: 10849377 / Vickie Leonard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period, you are not listening to the people that have to live and breathe it daily, our voice does not count.

I object to the last minute inclusion of new sites with less than 2 weeks’ notice, so someone could go on holiday and come back to find this!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/184  Respondent: 10849377 / Vickie Leonard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am thinking of selling my house to move out of this chaos but now the price of my house will suffer because of this. I am extremely disappointed resident and would like objections to be heard and responded to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3562  Respondent: 10849665 / Vivien Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44 to the proposed development of 40 houses and 2 travellers pitches at Send Hill. This site is a former land-fill/ waste site and any disturbance of this area would be a health hazard as nobody, including Guildford Borough Council knows what is buried there; it is very likely to contain hazardous waste.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1570  Respondent: 10849665 / Vivien Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed use of Green Belt for future development. It is essential that the green belt is protected as it provides the separation of towns and maintains the beauty and rural nature of our county.

It has long been the policy to use any "brown-field" sites as the basis for any development, of which there are plenty. These sites must be exhausted before green belt land could even be mentioned, thus opening the flood gates for massive development of any green belt land, causing towns like Guildford and Woking to be joined.
I do not understand why the council is considering this green-belt development, this will ruin the individual nature of the villages and cause them to become urbanised.

I therefore strongly object to the 2016 Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/7836</th>
<th>Respondent: 10849665 / Vivien Tully</th>
<th>Agent:</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I wrote to you on 30-6-2016 outlining my objections to any green belt development within the Guildford borough council area.

I object to any “in setting” (removal) of any villages from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/3188</th>
<th>Respondent: 10849697 / Audrey Moore</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT strongly to SEND Village being removed from the Green Belt which was supposed to be a permanent thing and there are no circumstances justifying abandoning it. Send's Green Belt provides a "stop" between Woking & Guildford Councillors & the Government gave us a promise to protect the green Belt and this clearly back tracks. Developers will leap on this and there will be nothing to stop them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT to building 45 houses at Clockbarn Nursery as there is such poor access and such great volume of traffic. Tannery Lane is far too narrow and cannot take more traffic. It is exceptionally dangerous for any vehicles exiting there to the main Send Road. The Lane just cannot take any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch opposite Send Marsh Rd. This site floods and is an ancient woodland. The industrial space is not needed but if were, it should be at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the new interchange with the A3 at Burnt Common because all the traffic from the proposed 2000 new houses at Wisley Airfield, 2000 at Burpham and 1850 at Blackwell Farm would have to be taken by SEND Send Road, which is already overloaded, would become gridlocked along with noise and pollution levels which are excessive already, would worsen.

I trust you will take all these OBJECTIONS into account.
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/480</th>
<th>Respondent:</th>
<th>10849761 / Tony Beresford</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td></td>
<td>I object to the proposal to inset Send Business Park from the Green Belt because, There is highly restricted vehicular access along Tannery Lane in both directions.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to the Policy A43 change at Garlick's Arch because, it will cause over-development of our village and the number of homes is excessive.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
I object to the Policy A58 at Burnt Common because, The impact on small surrounding roads will create traffic gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/752  Respondent: 10849793 / Anne Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/95  Respondent: 10849857 / Steve Giles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
Ref: Guildford Borough Transport Strategy 2017

I am a Guildford resident and a professional transport planner, with a consultancy practice on the Surrey Research Park. Having read the 2017 Borough Transport Strategy, my key comments are as follows:

1. I wholly support the proposed A3 Guildford tunnel as the only satisfactory long-term mitigation of the severe road safety, environmental (air quality, noise and severance) and economic (congestion) impacts associated with the existing A3.
2. I support short term measures to improve safety on the A3 through Guildford, but proper noise mitigation measures (i.e. a complete acoustic fence) should also be implemented to protect residents living near the A3.
3. I strongly support measures to improve sustainable modes of travel in and around Guildford town centre, including the reallocation of space to pedestrians, cycles and buses. Please also encourage more use of car clubs in the town.
4. More short and long stay car parking on the edges of Guildford town centre, combined with restricted vehicle movement in some streets, would reduce unnecessary car trips into the town centre. In principle, I would support a town centre congestion charge/road pricing system.
5. More joined-up cycle routes should be implemented to facilitate cycling within and through town centres, whilst wider routes should be available to the more ambitious cyclist between towns.
6. I am unconvinced by what I have read and heard so far in relation to mitigation of transport impacts arising from the proposed Blackwell Farm allocation, particularly in the absence of an A3 tunnel. If it proceeds, the development needs to be genuinely accessible by non-car modes; lip service will not suffice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1179  Respondent: 10849921 / I Lazopoulos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The land at Guildford Cathedral is currently designated as Protected Open Space. I object to the proposed change in status of this site to C3 housing on the grounds that it would have a significantly negative impact both on the wildlife and local community, and also importantly would ruin the vista of Guildford Cathedral, a historic landmark for Guildford and tourist attraction.

The proposed development of 100 dwellings at Guildford Cathedral would negatively affect the local community in terms of:

- Significant traffic congestion on Guildford Park Road leading into the town centre and out towards the A3 will only worsen due to the developments proposed in and around Walnut Tree Close, Guildford Station, along Farnham Road and Cathedral land. Given the recent road traffic accidents around the Friary Centre which resulted in a fatality and serious injuries, proposed development of the Cathedral land would result in congestion on Alresford Road, Benbrick Road and Ridgemount which are not equipped to deal with the throughput of vehicles from a further 100 dwellings, making it quite unsafe for pedestrians and the local community comprising of children. Moreover, the inadequate pavements in the area and bus depot at the bottom of Ridgemount makes it difficult and potentially unsafe for cars and pedestrians as buses manoeuvre in and out of the premises.
- Inadequate local infrastructure including schools
• Damage to local housing in Alresford Road, Benbrick Road, Ridgemount and Scholars Walk due to problems related to subsidence and inadequate draining.
• Damage to natural wildlife

Given the large number of proposed new dwellings for Guildford town centre, Onslow and surrounding areas, it is even more crucial that the Protected Open Space at Guildford Cathedral remains protected to ensure the health and wellbeing of the local community, natural wildlife and reputation of Guildford city and its historic landmark.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
The plan proposes a significant development of Green Belt land at the disused Wisley Airfield. I object to the proposed development on the basis that it is inappropriate development in the green belt and is unsustainable.

The council has failed to show that it is necessary to develop the Wisley Airfield, contributing to urbanisation sprawl along the A3 in Surrey, destroying the openness of the green belt.

The proposals will destroy the rural nature of local villages, Ockham in particular, but extending to Ripley, East and West Horsley, Cobham and Effingham. It will increase loads on local infrastructure which is already at breaking point: local roads and rail transportation will be overloaded, local schools will have to be enlarged thereby further damaging other sensitive villages and sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Forecast Population and Housing Increases: The forecasts in the ‘Evidence Base’ needs to be updated given the recent decision to ‘Vote Leave’ from the EU, especially given controls on immigration rather than freedom of population movement into the UK. In addition the ‘Evidence Base’ needs to consider the final decision on an additional runway at Heathrow or Gatwick or not at all. The Strategic Housing Market Assessment (SHMA) should be re-assessed based on these two issues and in addition be based on credible data inputs and model and not result in 70% higher than official national estimates for population growth in the Guildford borough.

This alarming incorrect data currently results in planning for more than 593 homes in East and West Horsley and a 35% increase in West Horsley housing alone which is not appropriate. Proportionate is included in the definition of Large Villages which leads me to conclude that the substantial development being planned for East and West Horsley are in fact likely to be very disproportionate to their current sizes. Whilst I believe that some new homes should be built in East and West Horsley, the types of these homes should be specifically controlled to provide homes for younger families and for older downsizing residents. The village does not need any more large and expensive 4 or 5+ bedroomed detached houses that will only mean massive profits for developers and will continue to distort the demographic balance of the village. The focus for East Horsley local house building should first priority be with the existing ‘Brownfield’ locations only.

The potential housing requirements therefore need to be corrected for a credible population estimate before any non-Brownfield locations could possibly be considered for development. If the total housing needs reflect lower population estimates, the Brownfield sites could account for the vast majority of the housing required. If the population projections are proved incorrect over an initial 5 year period, certain other sites would then not have to be considered for development. If the current projections prove to be too high, GBC will avoid unnecessarily building on previously undeveloped areas and irreversibly damaging the Surrey countryside. Student housing should be focused on the University site, and not be exaggerated for in local villages like East Horsley where transport links are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe the current Guildford Borough Council (GBC) Proposed Submission Local Plan is deficient, not justified and if implemented will have serious adverse consequences for my village East Horsley and our neighbouring parishes. Both East Horsley and West Horsley are distinct parishes as referenced in the Domesday Book of 1086 and as current Surrey Villages, being south of the M25 motorway, must continue to be protected as such. The Proposed Submission Local Plan should address improving the economic, social and environmental conditions in the area however it is not fit for purpose, based on obsolete population data as the basis and fails to provide simple advice to future planners who will face development proposal decisions.

Proposal to remove East Horsley from the Green Belt: The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. This Local Plan will expose East Horsley to the threat of urban developments wholly inappropriate that would not be permitted under the existing Green Belt classification - I find this unacceptable. There are no exceptional circumstances why this classification should be changed and East Horsley should therefore remain as a Village, like West Horsley, and continue to be included within the existing Green Belt protection. Only appropriate development and re-development opportunities should be supported in line with East Horsley’s own Neighbourhood Plan. East Horsley’s Neighbourhood Plan needs to be a means of providing a measure of local control to the planning process, in accordance with NPPF paragraph 17: “planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans’.

The existing East Horsley Infrastructure is not acceptable for the current population needs: I am very concerned with recent flooding from Pennymead Drive in East Horsley, down Ockham Road South and Ockham Road North and all the way to the A3 roundabout. I also now find out this area is in a Zone 3 Flood-zone and Functional Floodplain. Any further housing development will obviously severely impact further flooding in this whole area. Local residents who pass our house in a very narrow section of Ockham Road South going to Horsley station or to the local school get very wet every time it rains, because traffic splashes water from the flooded road on to the very narrow pavement. Insufficient work has been carried out on planning for and executing the infrastructure for the existing developments in East Horsley, let alone for any future new developments. Ockham Road South and Ockham Road North have not been constructed to take the existing traffic growth, let alone further expansion from any proposed new developments - a cycle lane along the road is also currently impossible to provide. Opposite our home, the start of Forest Road does not even have a pavement provided from Ockham Road South to Glendene. In addition the East Horsley medical facility is stretched and the local school is full so there is no planning for any future population expansion in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This e-mail sets out my objections to GBC’s New Local Plan.

I believe GBC is failing in its responsibility to the people of East and West Horsley and surrounding areas, and I itemise below my reasonings.

Wisley

Whilst I recognise that Wisley airfield is redundant land, the area is prone to flooding, as anyone who has lived here long enough knows. The access to the A3/Wisley roundabout tends to flood during serious rainfall, and the road has been impassable several times during the last sixteen years we have lived here. You cannot responsibly build 2000 plus houses and not provide a school, medical centre, some local shops, post office, community centre and recreational space. This should be a new community where people have their own facilities and not have to travel along narrow lanes to source them. These facilities should be put in place at the same time as the houses are built. I have seen no confirmation anywhere that GBC plan to provide these facilities. On average, each house could be expected to own two cars. At present the station car park in East Horsley is full each day. Where are these people going to park if travelling into London. Similarly, it is often difficult to get an appointment at the Doctors surgery, so they wouldn’t be able to cope with so many extra patients. I understand that commuters are now using the Village Hall car park and therefore when the Medical Centre car park is full, we are also unable to park in the Village Hall car park, and this is before just one extra home is built in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7751  Respondent: 10851201 / Jon Woollard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of Wisley Airfield: Ockham’s classification of other rural community includes “Rural communities unsuitable for taking any development including infill housing”. It seems ironic that GBC have now decided to propose a new strategic settlement of some 2,000 new homes on Green Belt land about 200 yards from the properties situated along Ockham Lane and only 2 miles from East Horsley. In the absence of real needs, this is an utter disgrace especially given the concerns with the very limited local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17193  Respondent: 10851201 / Jon Woollard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Designating Station Parade East Horsley as a District Centre: Identifying Station Parade, East Horsley as a District Centre and second in the hierarchy of retail and service centres after Guildford town centre is entirely inappropriate for this small parade of local shops in East Horsley and should be rejected. We need to retain the existing atmosphere of Station Parade and our Village. The existing Budgen’s is not a large supermarket but a convenience store which is the only reason it is allowed to open all day on Sundays. There is no spare land around Station Parade with already a shortage of parking spaces for shoppers. East Horsley also has a non-existent bus service to the Urban Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5668  Respondent: 10851201 / Jon Woollard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Schools and Medical facilities.

As you must know, our schools are full and our Medical Centre stretched. You are making no promises that new schools are to be built, so I am assuming children living in all these new houses will have to travel out of the area to attend other schools. Not ideal in any way, and that means more traffic on the roads, and speeding through the village on our narrow roads, already a problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17194  Respondent: 10851201 / Jon Woollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed developments in East Horsley, West Horsley and Ockham area represent a very significant increase in the number of homes given a total over-estimation of the real population growth projections and housing needs. Development at this scale will irrevocably change our Villages and cause considerable adverse effects on traffic, parking at local shops and railway stations, access to local school places, the medical facility and access to doctors. I do not think that the Local Plan provides a rational and fair basis for allocating housing to East Horsley, providing the required infrastructure improvements, or protecting East Horsley’s Green Belt and Village classification. It is not in the interests of East Horsley residents and I will help fight it all the way through the courts if needed until changed. I object in the strongest terms to these Local Plan proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/754  Respondent: 10851201 / Jon Woollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

I strongly object to the Horsleys being removed from the Green Belt. This is a beautiful area which is peaceful and friendly, although in recent years the traffic through the village has become a problem and localised flooding is becoming worse. The more housing that is built, water has nowhere to go. It seems that GBC has taken little notice of the concerns
of residents who are totally aware of the problems we will face if all these houses are built. As mentioned before, for every house built, we can expect two extra cars on our roads. What are you thinking?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17192    Respondent: 10851201 / Jon Woollard    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Extension of the boundaries of the East and West Horsley settlement area: There is no reasoning provided for these proposed changes and the East and West Horsley village areas inside these boundaries must not be removed from Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/756    Respondent: 10851201 / Jon Woollard    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that mention has been made of land at the tennis and cricket club at the top of Pennymead Drive. Are we not to have any recreational areas. Similarly the land at Kingston Meadow, which is enjoyed by everyone for sport, walking with dogs and for the village to come together to celebrate special occasions such as Jubilees and the Queen’s Birthday. I am completely lost for words that GBC can consider building so many houses in a lovely area and spoil it for everyone. At one time it was considered safe to be within a Green Belt area, so why are you allowed to now relax those rules. I understand that people need housing, and I have no objection to houses being built in small pockets around the village eg. The Telephone Exchange Land, and I understand the need maybe for housing on Wisley Airfield, BUT ONLY PROVIDED the aforementioned facilities are put in place, SCHOOLS, DOCTORS SURGERY, POST OFFICE, SHOPS AND RECREATIONAL FACILITIES.

Please please, give more consideration before you ruin a very lovely part of our country and turn us into a suburban community instead of a rural one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not believe the SHMA is sound because it counts overseas university students as permanent residents (their permanent address is given as their term time address - clearly the majority return overseas at the end of their course), these students are also counted as part of international migration; and no adequate adjustment has been made for the discrepancy between the 2011 Census and the population forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes.

Our roads are already busy and parking is limited. This includes parking at the railway station, and at the local shops where it is very often difficult to find a space. Our roads are frequently flooded in bad weather too, which could only be made worse by more pressure on the drainage system that so many new houses would undoubtedly cause.

The only medical practice is in East Horsley, serving both East and West Horsley as well as surrounding areas. It is an extremely busy practice and it can often be difficult to get an appointment. With the proposed increase in population this medical practice would be stretched even further.

This leads me on to mention the state schools in our area. The local primary and secondary schools, the Raleigh and the Howard, are very good and very popular. There have been times where children living in the village have been unable to
get a place there. This is already a big problem for local families, and we really do not have capacity in our existing schools to cope with the number of families that the proposed housing would bring to the village.

In conclusion, I ask Guildford Borough Council to revise the housing number, and to amend the Local Plan to maintain our existing village boundaries and green belt status.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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As a resident of West Horsley I wish to register objections to the new Local Plan as follows:

The purpose of green belt is to protect against urban sprawl and retain the character of rural communities like ours. The removal of green belt status and addition of large numbers of houses in the Horsleys would completely change the look and feel of our villages.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Exceptional circumstances for removing the Horsleys from the Green Belt have NOT been demonstrated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Upgrading services such as drainage, education, medical etc would make the plan totally uneconomic.

For these reasons I would like to record my objection most strongly to the Proposed Submission Local Plan; strategies and sites June 2016.
I am writing to object to the Guildford Plan, specifically the plans for West and East Horsley. My overall objection is the strain on the existing infrastructure, including any upgrades as part of the Plan. The density of the proposed developments will be significantly greater than anywhere now which is already severely overstretched at rush hour and school times.

The proposal to remove East and West Horsley villages from the green belt is hard to understand. It goes in the face of the successful protection which the green belt has given over decades. On principle it should be retained for the benefit of future generations.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I strongly object** to the GBC Spatial Strategy and the number of houses proposed to be built in the village. We are not a town and do not want or need this many houses in our village.

**I strongly object** to Send Village being removed from the Greenbelt. This is an atrocious plan, we want to retain our greenbelt protection now and for the future of our children and keep our green areas and wildlife safe.

I sincerely hope that Guildford borough listens to the people of Send village and stops the plans to excessively build on our Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/375  
**Respondent:** 10851745 / Natalie Green  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**A42 Clockbarn Nursery, Tannery Lane**

**I strongly object** to the building of 45 homes on this site. The traffic in our village is already excessive, Tannery Lane is a small country lane that cannot sustain more traffic and the junction onto Send Road is already dangerous. I am also concerned about flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/376  
**Respondent:** 10851745 / Natalie Green  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A3 Garlicks Arch, Send

I strongly object to 400 new homes and an industrial site. The additional strain on our resources in the village ie. schools and doctors surgery will be horrendous. The extra traffic through our beautiful village including HGV's is not acceptable. We in the village do not want a new 4 way junction for the A3. This site should remain as greenbelt with its beauty and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/377  Respondent: 10851745 / Natalie Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43a

I strongly object to the provision of a new north facing slip road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/378  Respondent: 10851745 / Natalie Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A44

I strongly object to the allocation of 40 homes and 2 traveller sites. This is our countryside full of natural beauty and wildlife, our children should be able to walk in our village and see deer, foxes, birds as their parents have done before. This is an appalling application which again will affect the over burdened traffic in our village and our resources such as local schools and doctors surgery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GBC has not listened to the residents at all and you have in fact amended your plans to make the outcome worse for Send villagers.

I strongly object to the proposal to inset Send Business Park from the Green Belt because:

Tannery Lane has restricted access and is not suitable for more vehicles.

It is in an area of outstanding beauty, is already a large site and does not need or warrant being made bigger at the detriment of our beautiful countryside and wildlife.

I sincerely hope that this time you listen to the resident of Send's objections and act accordingly. Leave our green belt alone!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to the Policy A42 change at Clockbarn in Tannery Lane because:

You have increased the number of houses and not reduced the number in your plan.

The traffic problems in Tannery Lane and the A247 junction are already dangerous and will worsen.

It will ruin and make the erosion of the Green Belt in our village worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Policy A43 change at Garlick's Arch because:
There is no proven demand for Travelling Showpeople in this location
It is green belt land and no exceptional circumstances exist
The number of homes is excessive and not needed in our village
It will generate excessive traffic and block up already busy roads in Send
The land is subject to flooding and is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/509  Respondent: 10851745 / Natalie Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A 58 at Burnt Common because:
The impact on small roads throughout Send will cause gridlock in the village
It was deleted from the 2014 draft because of all the objections made previously
There are empty sites and industrial units at Slyfield and it therefore not necessary to build on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6338  Respondent: 10852033 / Sarah O'Donoghue  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to forty new houses! And two travellers pitches put forward in the local plan, I live in Winds Ridge and as I'm sure you are aware it is a single track Road (Send Hill), which is completely unacceptable and impractical to accommodate forty houses with the increased traffic flow. We already have much congestion due to the school traffic at the end of Send Hill causing lengthy delays.

There would also be no practical way of travellers in large vehicles being able to negotiate the narrow lane.

As I'm sure you are also aware Send cemetery sits very near the proposed travellers site as well as the new housing site, which is currently a peaceful, quiet location for people to visit their deceased relatives, that tranquility would also be lost.

Lastly the proposed housing site is one of the few open spaces for local people to be able to walk either with their dogs or children enjoying nature, The open space was recently used by the air ambulance to airlift a local neighbour, that would also be lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/471  Respondent: 10852065 / S Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all building in Send because,

1. You have already given permission for a marina which has parking for 84 narrow boats. This means more cars to & fro along Tannery Lane.
2. More office building in Tannery Lane with obviously more traffic.
3. Houses in Clockbarn Nursery more traffic in Tannery Lane. This road is far too narrow and access onto A247 junction is impossible as it is.
4. Also the effect all of this will have on schools and doctors.

The more houses you build means there are no longer any villages as they will all be joined together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/726  Respondent: 10852097 / Bryan Wakefield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council Plan (2016).

I am objecting to the 2016 draft local plan.

I have lived in Send Marsh for forty-four years. During that time I have seen Send Marsh, Send, and Ripley grow as new developments and extensive infill have taken place. During that time no attempt has been made to upgrade the infrastructure. The roads do not have sufficient capacity for today’s traffic, and there seems to be no plans to answer traffic
congestion issues. The only exception was the Ripley bypass. What a mess the A3 would be if that had not happened. The proposed all way access to the A3 at Burnt Common is no more that a sticking plaster token solution.

The utility supplies also need to be addressed now, before any additional consumers are added. Winter evenings and we regularly see electricity drop to 190 volts. Not enough to start a fluorescent light tube.

What are the plans for additional health and education facilities to support the increase on population?

During my time in Send Marsh I have witnessed many planning attempts to blight the villages along the A3 with mindless developments. The latest GBC Plan has to be the most appalling attempt so far to turn pleasant Surrey villages into ghettos.

The concept of the Green Belt was introduced to give communities green space, countryside, and identity. In the quest to build houses, GBC seems to have completely ignored the concept of quality of life for those who live in the Borough and who through their efforts, contribute to the very existence and wealth of the Borough and the County.

BEFORE any further developments are even considered the present infrastructure needs to be addressed. Traffic management on the A3 and feeder roads from the M25 to south of Guildford can only be described as a complete farce. Road congestion both morning and evening is an utter disgrace. It has been like it for years and clearly demonstrates a complete lack of nous demonstrated by GBC Planning.

Is GBC just going through a numbers game? “We have been told we have to build thousands of homes, so we will just stick them along the A3”. With the advent of Brexit, the whole future housing requirement must be questioned, as should why is this part of the Borough is being so heavily targeted. It really does beg the question who are the beneficiaries of this plan. The lateness of the addition of Garlicks Arch will clearly result in many people asking many FOI questions for a long time to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

What are the plans for additional health and education facilities to support the increase on population?

During my time in Send Marsh I have witnessed many planning attempts to blight the villages along the A3 with mindless developments. The latest GBC Plan has to be the most appalling attempt so far to turn pleasant Surrey villages into ghettos.

The concept of the Green Belt was introduced to give communities green space, countryside, and identity. In the quest to build houses, GBC seems to have completely ignored the concept of quality of life for those who live in the Borough and who through their efforts, contribute to the very existence and wealth of the Borough and the County.
BEFORE any further developments are even considered the present infrastructure needs to be addressed. Traffic management on the A3 and feeder roads from the M25 to south of Guildford can only be described as a complete farce. Road congestion both morning and evening is an utter disgrace. It has been like it for years and clearly demonstrates a complete lack of nouse demonstrated by GBC Planning.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/20  **Respondent:** 10852161 / Andrea McGeachin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I do not believe the plan has considered properly road infrastructures and as a resident of Ripley have major fears and so I object

1. I also do not believe the plan considers the provision of enough Schools and Doctors and so again I object.

Finally I would ask the borough to re think the plans based on the community responses properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/45  **Respondent:** 10852161 / Andrea McGeachin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I find myself having to object again to things the council are trying to put through when precious objections were made.

I object to the following areas of the draft plan.

1. The erosion of the local Green Belt and what is called "in-setting" of any villages from the Green Belt. I live in Ripley, and am objecting to the plan to take Ripley, Send and Clandon out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/46  Respondent: 10852161 / Andrea McGeachin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object again to the plan bringing too much development in one area of our borough. I am for development of affordable housing but this plan is disproportionate.

   1. Though I do believe in affordable housing development this plan is not in my view considering affordability and is squeezing too much into these smaller more expensive and so I guess profitable areas. Instead of placing distributed development across the borough to support the whole borough. The numbers are too focused in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/96  Respondent: 10852161 / Andrea McGeachin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. The consultation period is very limited and creates a fear to myself as a resident that this is not being consulted properly. This also includes the last minute additions that are less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the building of 45 houses at Clockbarn nursery because of inadequate access and traffic volume. This road is far too narrow to take on more traffic with the junction with Send Road being hazardous when trying to pull out into the main road. there is already a development going ahead including 64 apartments and a marina which will increase congestion in this road.</td>
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<td>I object to plan A43 which includes the 30 hectares of Garlick's Arch in this Plan A43. This site is new and was not included in the Regulation 18 Draft, and has not been consulted on previously. It forms part of the Green Belt and is permanently protected by the NPPF, which is there to prevent the merging of settlements. It also contains around 5 hectares of ancient woodland, some of which dates back to the 16th century the plan includes the building of 400 houses and nearly 2 acres of industrial buildings and warehousing. The ENLA of 2015 shows an 80% reduction in employment space over that of 2013, therefore industrial space at Burntcommon is no longer required. Quite apart from losing Green Belt land, the extra traffic generated by an estate of this size, which will consist of about 800 cars and many HGV's, will put an unbearable pressure on all the roads around the Burntcommon roundabout (A247/B2215), especially at rush hour times. As well as the roads being unable to cope with such huge population growth, neither will the local schools or the Villages Medical Centre.</td>
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I object to plan A43A a new northbound slip road to the A3 from Clendon Road and a new southbound off slip from the A3 to A247. The proposal to create extra entry and exit slip roads from the A3, London bound, off the A247 Clandon Road will add grossly to the congestion that is already a big problem at the roundabout and surrounding roads in Send at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the development of 40 houses and 2 traveller pitches at Send Hill. The access to this is insufficient as the road is narrow and single track.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the fact that the infrastructure has not been considered and is inadequate to deal with the proposed housing levels and additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of Send from the Green belt because the village and countryside provide a necessary buffer between Guildford and Woking and there are no special circumstances that can be justified for building on the Greenbelt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Guildford plan which has not identified sufficient brownfield sites within the urban area and includes 70% of the proposed housing of 13860 targeted in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy = A42 change at Clockbarn in Tannery Lane because:

- The increase in the number of proposed homes on the plan has increased by a third, with no reasonable justification
• It ignores all the hundreds of previous objections made by local people
• It will increase problems with the traffic in Tannery Lane and at the A247 junction
• It will cause erosion of the Green Belt in our village
• It will increase surface water flooding, which is already a problem, and increasing with further development
• It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3133  Respondent: 10852289 / Barry Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlicks Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlicks Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no exceptional circumstances exist
• It will cause overdevelopment of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3134  Respondent: 10852289 / Barry Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word minimum is a change from the previous maximum in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1453  Respondent: 10852289 / Barry Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1  Respondent: 10852577 / Andrew Rustell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I've lived in Guildford all my life and I cannot help but point out that the section on infrastructure is fatally flawed. As a person currently trying to become qualified as an environmental consultant I appreciate the need to protect the environment and provide sustainable forms of transports, but there is a need to recognise that Guildford's economy at present has a heavy reliance on the car as the primary means of transport and that isn't going to change in the short-term - thinking otherwise is delusional. Guildford therefore needs good road access, but there has been historically a real lack of nerve to make the decisions that really needed to be made for the sake of the prosperity and development of the town, and what worries my is that there doesn't seem to be much a move to correct this. There really should be a proper short-term of long-term internal road development plan devised. Amongst other things, the town desperately needs the ring road that should have been built in the 1960's instead of creating the town centre gyratory system and Millbrook, thereby routing all through-traffic through the centre of the town. That planning decision is now coming back to haunt us in the form of excessive traffic congestion through the town centre at peak times. The good thing is, it is not too late - there is still room to build a ring road within the Guildford Borough boundary and it could easily be justified as it would provide a means of developing the town in a more planned, coherent manner, and a vital main transport link along which further developments around the edge of the town could be placed. However, I'm not going to hold my breath for this, because like most people living in the town I know that unless the council gets to grips with this, it simply won't happen, which is bad for the people who live here in Guildford and bad for the Guildford economy. I appreciate that the idea of a ring road won't satisfy everyone, but it is what Guildford has needed for over 50 years and needs now more than ever. Naturally it will upset some people - particularly large landowners (as it did in the 1960's - which is why the ring road didn't get built back then) and some environmental campaigners who can't appreciate it that Guildford may exist in an AONB, but people still have to be able to live here and get around easily, and sometimes that means by road, but the vast majority of people will be glad to have a better way to get from one side of Guildford to the other, when they don't need or particularly want to have to go through the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th><strong>Comment ID:</strong> PSLPS16/1836  <strong>Respondent:</strong> 10852801 / Carolyn Hart  <strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000 sq. metres of industrial space at Garlick’s Arch. This area is covered by ancient woodland and the area is prone to flooding. If industrial space is needed why can this not be accommodated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th><strong>Comment ID:</strong> PSLPS16/1837  <strong>Respondent:</strong> 10852801 / Carolyn Hart  <strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed new houses at Wisley airfield, Gosden Hill at Burpham and Blackwell Farm. Much of the traffic from the A3, M25 Woking and Guildford would go through Send. Send Road and Clandon Road are already overloaded with traffic and would become gridlocked. Currently I can sit for ages trying to get out of my entrance on to the Clandon Road if this interchange were to go ahead it would be impossible. Noise and pollution levels which are already excessive would get worse. This would be a disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the houses at Send Hill because this is Green Belt and an area of beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3977  Respondent: 10852801 / Carolyn Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Re: Local Plan, Guildford

I object to Send Village being removed from the Green Belt. I understand that the Green Belt was intended to be permanent and I don’t see special circumstances to justify abandoning it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/738  Respondent: 10852801 / Carolyn Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to all the proposed sites in Send because they were not included in the previous consultation in 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1405  Respondent: 10852897 / Diana Goddard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
The six development sites listed on the new plan amount to a total of 533 new houses, I am trusting these houses will be affordable housing to enable the younger generation to move back into this area. At the moment every house being built consists of four or more bedrooms, we need smaller homes – not all cramped together either.

Planning for Thatcher’s Hotel I do strongly object to for the following reasons:-

Firstly, The Claudel Hotel, Epsom Road is now a nursing home

Secondly, Bookham Cetange Hotel is residential care

Thirdly, Preston Cross Hotel will also be nursing care homes which leaves only one hotel for the whole area, I do feel this Hotel could still have a future, it has quite a lot of history going back to the days of a tea-room, a lot more thought needs to be put into this, I’m sure someone could make it into a thriving business

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/268  Respondent: 10853089 / J Goulding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

I object to the 2016 Draft Local Plan for Guildford and I wish my comments to be seen by the Planning Inspector.

I object to the enclosure of Green Belt land within proposed new village boundaries and the consequent presumption that the land then becomes available for future development. This is in clear contravention of the government's stated commitment to Green Belt protection.

I object to the number of homes, warehousing and industrial sites that the Plan intends to deliver at Garlick's Arch (Policy A43). This is a new site included with less than two weeks notice and has not been consulted on previously.

Local roads in this area are already clogged with traffic, the schools and GP surgery already oversubscribed. Send Road (A247) is almost at a standstill at peak times. How can Send and Ripley cope with development on this scale which will completely alter the balance and identity of the villages. Garlick's Arch is an area of Green Belt upon which is ancient woodland which must be protected to prevent the merging of the two villages.

I object to the proposed creation of north and southbound slip roads to and from the A3 (Policy A43A) at Burnt Common - another late addition to the Plan.
I object to the misleading use of the word 'insetting' which implies 'putting inside of and protecting' but is actually being used in the Plan to mean 'removing or moving outside of'.

I object to the redrawing of the Green Belt boundary to exclude an area of land between Danesfield and Send Marsh Road without any notice and without any consultation with residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9805</th>
<th>Respondent: 10853249 / Evan Parry-Morris</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate size of sites in relation to rural locations

I object to the allocation of land to the sites of Wisley Airfield, Garlick’s Arch on the Ripley/Send border, and Gosden Hill at Clandon as the proposed development will have an adverse and permanent impact on local villages and their communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9800</th>
<th>Respondent: 10853249 / Evan Parry-Morris</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local healthcare facilities overwhelmed

Many local health services, such as the Villages Medical Centre, Send, are being stretched already, and it’s becoming more difficult to get doctor/nurse appointments without unacceptable delays. This would become significantly worse should the draft local plan be implemented. I object to the additional stress that would be caused should the proposals be implemented.

Lack of proper infrastructure planning for sites
Local infrastructure is already stretched, and there appears little or no planning or implementation of improvements prior to the proposed plan. This is particularly true at Garlick’s Arch. I object to the lack of proper infrastructure planning of local services such as doctors and schools.

Sites planned in unsustainable locations

Many strategic sites, such as Garlick’s Arch and Wisley Airfield, are in unsustainable locations. They are not located near any railway stations, and would not be within easy reach of local villages. With infrequent bus services, residents would be reliant on the use of motor vehicles resulting in further pollution and congestion. I object on the grounds of the sites being unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9802 Respondent: 10853249 / Evan Parry-Morris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Unsuitability of local roads for heavy vehicles and more traffic

Many local roads around the villages of Send, Ripley and Clandon are narrow and there are already many instances of vehicles having to mount pavements to allow large vehicles to pass. This is particularly an issue on the A247 between Burnt Common and Clandon Crossroads. The inclusion of the Garlick’s Arch proposal, particularly the industrial and warehousing elements of the plan, is certain to make the situation far worse. I object to the development proposed in the local plan, which will result in more traffic using narrow roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9803 Respondent: 10853249 / Evan Parry-Morris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Parking issues in local villages caused by a larger population

Parking in local villages is already an issue. It is frequently impossible to find parking in Ripley if you require to stay for more than two hours. I object to the proposals as further development around our villages will only make the situation worse.

Congestion on the trunk roads, A3/M25

The A3 and M25 already suffer from severe congestion during rush hours, in addition, Highways England have no plans to improve the A3 prior to 2020. I object to the development of these sites shown in the local plan because trunk roads would be unable to cope.

Congestion on local village roads and lanes

Many of the villages are suffering from severe congestion, for example the Shell roundabout at Burnt Common, and the Newark Road & Rose Lane junction in Ripley. I object to the further development which will cause further congestion in and around our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9801  Respondent: 10853249 / Evan Parry-Morris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green belt is not being protected

There are no special circumstances for the removal of green belt. I object to the proposals for the removal of Send, Ripley and Clandon from green belt. Once taken, the green belt is forever lost

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9806  Respondent: 10853249 / Evan Parry-Morris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Unbalanced development in one area of the Borough

There appears to be a large part of the proposed new housing concentrated between the M25 and Burpham. I object to my local area being subjected to such a large proportion of the allocated development, when it would be better spread more evenly throughout the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1308  Respondent: 10853249 / Evan Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Limited consultation period

I object to the limited consultation period for the Guildford Local Plan. The range and extent of the proposals would have benefitted from a longer period of consideration.

Late inclusion of new sites in the Local Plan

I object to the late inclusion of parts of the Local Plan with less than two-weeks notice. This particularly relates to the Garlick’s Arch and the four-way on/off ramp to the A3 at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/65  Respondent: 10853249 / Evan Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to raise the following objections to the Guildford Local Plan 2017:

I object to the proposal to inset Send Business Park from the Green Belt because:

a) Highly restrictive vehicle access in both directions along Tannery Lane.

b) The openness of the Green Belt will be ruined due to expansion or development at this location.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/523  Respondent: 10853249 / Evan Parry-Morris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the policy A42 change at Clockbarn in Tannery Lane because:

a) The 33% increase in housing is over excessive.
b) Previous objections by local people have been ignored.
c) Traffic problems between Tannery Lane at the junction with A247 would be worse.
d) Green Belt erosion would worsen.
e) Flood risks would worsen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/522  Respondent: 10853249 / Evan Parry-Morris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

a) It ignores many thousand previous objections from local people.
b) There are no proven reasons why there should be Travelling Show People plots at the location.
c) There are no ‘exceptional Circumstances’ why the Green Belt should be permanently damaged.
d) The number of new homes would be excessive, and our village would be over-developed.
e) Send and Ripley would be joined, and Green Belt would be sacrificed.
f) The area is subject to flooding.
g) Increased traffic will cause gridlock on local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A58 at Burnt Common because:
  a) It had previously been deleted from the 2014 draft because of previous objections.
  b) Since the 2016 plan there has been a decline in demand for industrial land, so it is objectionable that the word ‘maximum’ has been changed to ‘minimum’.
  c) There is no need to build industrial units on Green Belt land when there are empty sites at Slyfield.
  d) The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole borough, not a huge over allocation of 10 hectares at Send in the Green Belt.
  e) Increased traffic will cause gridlock on local roads.
  f) Adjacent villages will be joined, defeating the purpose of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7905   Respondent: 10853697 / John Lobley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a resident of Burpham for over 30 years and view the Guildford Borough Council Draft Local Plan (“the Plan”) and its effect on the area and town in which I live with sheer horror and bewilderment. How it can be considered practical and necessary to have such an intensive and unsustainable development in an area where the infrastructure is already under pressure defies any logic and has complete and cynical disregard for the quality of life for the residents who will be affected. I have studied the content of the Plan and attended presentations by the Council where I voiced my concern about the impact on transport, schools, medical facilities and other infrastructure items. It was quite apparent that even the Council’s staff there present considered the impact of the proposal to build 2,000 homes on Gosden Hill (“GH”) alone would be catastrophic on an already overcrowded road network in Burpham. This is only one of many major proposals in the Plan which would degrade the lives of the residents of Guildford as a whole, but is by far and away the most destructive in terms of negative impact.

The destruction of the Green Belt around Burpham by the GH proposal is a travesty to the basic planning principles that have been honoured in post-war Britain, and is in direct contravention to promises given by the Government to voters in recent General Elections.

There is no evidence to support the need for such an intensive development in the Plan. Now that the Government has announced it will proceed with Brexit the need for housing will decrease and the Plan needs to be redrawn in terms of housing need. Sustainable development on existing brownfield sites is what is needed, not environmental destruction. Has anybody considered the effect the building of 2,000 homes on GH will mean in terms of lorry movements and pollution for local inhabitants?
Why is the Council concentrating so much of the development in one area? There is no clarity or transparency regarding the other bugbear for the Burpham area, namely the Slyfield area Plan and the related access road, which also proposes dramatic increases in HGV movements along Clay Lane, already congested due to the sheer amount of traffic and is potentially dangerous due to the number of schools on the route. If GH and Slyfield go ahead I shudder to think of the congestion that will occur on the access roads in the Burpham area.

The proposals to introduce a new train station and Park and Ride for GH will not in any way alleviate the impact of at least another 5,000 cars on our roads. The Plan should be shelved immediately as it does not represent the interests of Guildford residents as a whole, and those of Burpham in particular. There has been inadequate consultation for such a far-reaching and potentially catastrophic proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/214  Respondent: 10853697 / John Lobley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that in the Revised Local Plan (“RLP”) that there has been a small reduction in the proposed number of houses to be built on the green belt sites, although in the main the sites themselves continue to be earmarked for development at a level which is totally unsustainable for the existing community. I attended a presentation at Tongham and asked numerous questions to the Council staff (Mr Spooner was not present) and was not given any satisfactory responses. There was no presentation at Sutherland Park and this omission is remarkable considering the impact of the Gosden Hill Farm (“GHF”) on the residents of Burpham, of which I am one. As such a resident I know first-hand the impact of an additional 5,000 vehicles (from 2,000 new houses) on the already clogged-up narrow roads, in particular Clay Lane which under an additional threat from the Slyfield Regeneration Plan. It is clear that the Council is adopting a plan of “housing first, infrastructure second” as there is no clear plan to ease the traffic other than token gestures such as a new station and park-and-ride (which nobody uses anyway).

I ask that the greenfield sites be removed from the plan, not out of NIMBYism but out of a genuine and deep-seated concern over the effect on the existing community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/32  Respondent: 10853857 / Norman Kidd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **EVIDENCE.** GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is **exaggerated.** If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. **50 of new homes needed could be built on brownfield sites!** GBC’s Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy of option of removing Green Belt in areas that do not generally affect them directly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I have strong objections to the latest version of the local plan as recently published and in particular as it affects Send and our local environment.

It seem to me that many of the objections raised a year or so ago, which on the surface seemed to have been taken into account of, have now been completely disregarded in the latest version and several new projects introduced. all of which have an adverse effect on the village. In particular the concept of taking Send completely out of the Green Belt classification.

In my view we do not need as many houses as the government think, what we need is less people but that is a matter for the national government to resolve with the electorate at large.

I would ask that this letter of objection and my comments below be seen by the Inspector.

1. **GBC HAVE NOT FOLLOWED CORRECT PROCESS.**

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process and I strongly object to GBC officials completing ignoring the views of the local population who elect them.
1. Evidence GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80 reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50 of new homes needed could be built on brownfield sites! GBC's Transport Assessment was not even available to councilors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy of option of removing Green Belt in areas that do not generally affect them directly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2028  Respondent: 10853857 / Norman Kidd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

So in summary I do strongly object to the proposed unreasonable level of development crammed into such a small area and I hope the review process sees the common sense in keeping the developments to a sensible scale for the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/90  Respondent: 10853857 / Norman Kidd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A 43.30 ha LAND AT GARLICK'S ARCH, Burnt Common, designated for 400 houses and 7,000 sq m of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the borough. This site is NEW and was not included in the Regulation 18 draft and has NOT been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Needs Assessment 2015
(ELNA) shows a reduction of 80 in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it. In fact, leaving Send Close to join the A247 always takes several minutes due to the traffic loads, during peak times takes a lot longer. The proposals now being brought forward will increase the traffic loads to a huge degree to an unacceptable level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Policy A44. 1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 Travellers Pitches. This site is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site. I object to the proposals on this site mainly because it is a please country lane but by definition narrow! The addition of unsuitable traffic, coupled with the inherent danger already existing at the Potters Lane end of the Send Hill make the proposals completely ridiculous.

Whilst School Places do not affect me personally and others are probably more qualified to speak on the subject. As I understand it many did not get their children in to their first choice of St Bede’s, these developments will just make it harder which will mean more traffic on the roads for school runs.

What does affect me is the inability to get a doctors appointment in a reasonable time at the Villages Medical Centre – these developments will add to that pressure, without I would imagine more resources being made available.

So in summary I do strongly object to the proposed unreasonable level of development crammed into such a small area and I hope the review process sees the common sense in keeping the developments to a sensible scale for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3983  Respondent: 10853857 / Norman Kidd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8495  Respondent: 10853857 / Norman Kidd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst School Places do not affect me personally and others are probably more qualified to speak on the subject. As I understand it many did not get their children in to their first choice of St Bede's, these developments will just make it harder which will mean more traffic on the roads for school runs.

What does affect me is the inability to get a doctors appointment in a reasonable time at the Villages Medical Centre -these developments will add to that pressure, without I would imagine more resources being made available

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT.** I strongly object to the removal of the buffer that Send provides between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT. I strongly object to the removal of the buffer that Send provides between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. GBC HAVE NOT FOLLOWED CORRECT PROCESS.

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process and I strongly object to GBC officials completing ignoring the views of the local population who elect them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPA16/1694</th>
<th>Respondent:</th>
<th>10854113 / Sarah Pickering</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1695  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3266  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3264  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
WE OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higheclotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution, which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3265  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a Brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

WE OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/7176 | Respondent: | 10854113 / Sarah Pickering | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
WE OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

WE OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7184  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development, which will “enhance” heritage assets, which I fear, is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7185  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages, which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7173  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site, which is in the Green Belt, should not be developed as a Strategic Employment Site when there is a suitable alternative Brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7174  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>WE OBJECT to the location for new employment floor space (Policy E2)</td>
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<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.</td>
</tr>
<tr>
<td>There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/7175  Respondent: 10854113 / Sarah Pickering  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>WE OBJECT to the loss of rural employment (Policy E5)</td>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7183  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
WE OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on Brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature, which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7181  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7182  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm
and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7186  Respondent: 10854113 / Sarah Pickering  Agent:
WE OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford Borough Housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals, which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
WE OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

WE OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing Greenfield over urban, Brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of house building as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean NO development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7179  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy, as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7178  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7180  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
WE OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7171  Respondent: 10854113 / Sarah Pickering  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

 Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition WE OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7169  Respondent: 10854113 / Sarah Pickering  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WE OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/7170 | Respondent: | 10854113 / Sarah Pickering | Agent: |
|-------------|--------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
|             | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
WE OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is totally unacceptable to even contemplate the development of houses/industrial units at Wisley Airfield, Garlicks Arch and Gosden Hill Farm. Whilst it is anticipated the plan will ensure sufficient health care and schooling is in place it is totally obvious to any user of the local roads during peak rush hour (both morning and evening) that the A3 and M25 cannot cope NOW and I don't see how widening these roads is going to improve the situation or adding an extra junction...just create more accidents and more delays when trying to exit the A3 for the M25.

This current plan is flawed and needs to be put in the bin. A sensible plan considering current residents, the environment, what is achievable with the major infrastructure needs to be developed. It is not just about the profits that can be made by companies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/655  Respondent: 10854241 / Sian Holwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly please confirm receipt of this objection to the proposed Local Plan. As a long standing resident of Send under no circumstances should the Green Belt be encroached by any proposed development. The Green Belt provides local residents with a certain quality of life...that is what I have paid for in the cost of my house and I am not prepared for Guildford Borough Council to take that away from me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/379  Respondent: 10854241 / Sian Holwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2840  Respondent: 10854241 / Sian Holwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• There is a 33% increase from 45 to 60 and its too much
• It ignores all the hundreds of previous objections made by local people
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2841  Respondent: 10854241 / Sian Holwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Garlick’s Arch, Send Marsh, Policy A43.

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people and increases the housing to 400 with 6 travelling showpeople plots. Why?
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Land at Burnt Common, London Road, Policy A58.

I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously but it has been seen fit to reinclude. Why?
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/698  Respondent: 10854401 / Roger Newth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6627  Respondent: 10855201 / Mary-Ann Witherington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Conservation of our environment, habitats and declining species and flora and fauna.

The proposed ‘Local Plan’ will have a negative effect on our environment. In recent years there have been serious declines in many species of flora and fauna due to the increase in human population and all that it brings, e.g. Disturbance, air and noise pollution, litter, vandalism, predation by pets.

The site lies within the Green Belt, all habitats within or adjoining A46 are Priority Habitats under the NERC Act and have European Protected Species. This plan will also impact on views from the AONB.

Highways, traffic congestion.

I live on the Guildford Road and it is already very busy and at peak times morning and evening it is very congested. Traffic is queuing every Monday to Friday at peak times. The proposed ‘Local Plan’ would increase traffic on the Guildford Road causing potentially more accidents (which have happened close to my house) and an increase in air and noise pollution. I have not seen any evidence that GBC have produced a successful method of easing congestion on the Guildford Road in conjunction with the proposed ‘Local Plan’.

Local secondary School.

The local secondary schools have been contacted by our Parish councillor’s and their Head teachers have said their schools are under subscribed, so we do not need another secondary school.

GBC’s consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site. The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation.

My final thoughts.

I think our ‘Local Plan’ needs to reflect the views of Normandy and local area residents much more closely. The current proposed ‘Local Plan’ includes building over 1,100 houses which in my opinion is far too many.

I realise there may be a need for affordable homes but I strongly object to large scale house building in rural settings like Normandy and Flexford.

If there is a justification for affordable housing in the Guildford area then I would conclude that the people to whom the houses are intended are likely to be working in Guildford centre or close to it. There is no large scale employment in Normandy.

Therefore why can’t GBC get more creative and fully utilise brown field sites in urban areas and consider building attractive low level flats? This will also aid traffic congestion into Guildford as those that live and work in and round Guildford are more likely to use the bus or walk to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that infrastructure requirements do not appear to be taken on board with development of the area, when will Guildford Borough Council take a sensible view of the situation? Let us have some common sense on these plans.

With all these new proposed plans, we need raise this point, How will The Villagers Medical Centre cope with even more patients? How will The Royal Surrey Hospital cope with more Parking. Just can you possibly think these plans are viable?

I have been a Taxi Driver for 50 years and know the ever increasing problems of added traffic conditions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6243   Respondent: 10855297 / Susan Mansbridge

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to 45 houses at Clockbarn, because of inadequate access and volume of traffic. Tannery Lane is too narrow and unsuitable for more traffic. Planning permission has already been given for houses and the marina, how do you imagine the roads can cope with more vehicles?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6244   Respondent: 10855297 / Susan Mansbridge

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Garlick’s Arch development, this area floods, will new house owner’s be able to get House Insurance? In fact will they even be informed that the land is likely to flood, or has been flooded in the past?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6242  Respondent: 10855297 / Susan Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed new interchange onto the A3 this will cause congestion on the main road right through Send village. Every time the A3 has a traffic problem our road is nose to tail often as far as the Old Woking mini-roundabout, that is a mile and a half of solid traffic. The knock on effect of too much traffic means, Potter’s Lane and Send Marsh Road have the same problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1891  Respondent: 10855329 / Imelda Rider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the grossly overstated future housing need that underpins the Guildford Borough Plan. I accept new housing is required, but I question the assumptions that have been used. I believe if a more realistic assumption was used, it would be possible to accommodate new housing within existing urban brownfield areas.

I strongly object to removing Send from the Green Belt. Green Belt exists for very good reasons to help protect the countryside from inappropriate development. Once areas are removed from the Green Belt and developed, there is no going back. If the GBC Plan is not reconsidered the scale of development in the Green Belt along the A3 corridor would completely change the character of the area and cause considerable congestion as the A3 and local roads would not be able to cope. The A3 is already congested without this scale of development.

I object in particular to the proposed development at Garlick’s Arch. The proposed 400 houses and commercial units would completely swamp existing local roads, schools & medical facilities. This would be further exacerbated by the proposed new interchange onto the A3 at Burnt Common that I also strongly object to. Current traffic levels are already
too high around Burnt Common. Expanding the A3 junction would cause gridlock all day along A247 and Portsmouth Road. We are already struggling with the current situation of traffic in the area anytime of the day. I also object to the Garlick’s Arch proposal on the grounds that it was not included in the previous consultation in 2014, and was added to the current proposed plan at very late notice, preventing proper due diligence from all interested parties. I also object to the proposed commercial development, as I believe it would make far more sense to expand the current commercial Slyfield area where I understand land is available.

I object to the proposed 45 houses at Clockbarn as the existing roads (Tannery Lane) are very narrow and struggle to cope with current traffic levels. Adding further houses would cause major traffic issues all day long that would also impact Send and Send Marsh areas. In addition, permission has already been granted for a marina development that current infrastructure will not be able to cope – a second development is just nonsensical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5064  Respondent: 10855361 / Muriel Brock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2605  Respondent: 10855393 / Adrian Juste  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
RE: SEND VILLAGE. GREEN BELT INCURSION

It must be wonderful to be a property developer - sitting there with nothing to do except vandalise the Surrey countryside, eagerly perusing your commissioned aerial photographs, greedily peering at open spaces and green bits - totally oblivious to the wonderful fecundity, streams, woodlands and healthy abundance of wildlife there.

The developer sees none of this - just 'business opportunities' where a couple more houses and yet another Tesco Express could be squeezed in ... no conscience, no altruism ... just greed.

In the odd moment of benevolence they salve their consciences by proclaiming they create jobs and provide much-needed housing - which translates to jobs for 3 months and houses that no ordinary person could afford.

A property developer's standing on the social pariah scale is now alongside that of the average MP.

I know quite a few developers .. most of whom are boring, soulless individuals you'd pray you're never stuck in a lift with.

And so here we go again: the annual battle with Guildford Council and their mates - the whittling away of the Green Belt - which was created for a purpose, by people gifted with more wisdom and foresight than the elected guardians we're blessed with now.

I do appreciate your problems on the Council: It can't be easy with the government pouring people into the South East year on year They care little - after all, many of its members will have their fat pensions and a couple of 'consultancies' to fall back on, leaving some other poor sap to try to sort out the mess they've made.

Viewing your list of proposals on this new Local Plan is very depressing:

Light industry? Travellers Sites? Housing Estates? ..

Are you mad??! You hope to push these proposals through with little or no added infrastructure? Oh, please!

The proposed Garlick's Arch and Tannery Lane developments are of particular concern to me.

What your plans should involve is building roads and services for the villages & communities we have now, not piling yet more straws onto the enervated camel's back.

Thanks to much-vaunted 'Austerity' our infrastructure is grinding to a halt: roads can't be maintained, paths and road signs are completely overgrown, making getting about more of an ordeal with every week that passes.

And I wonder if any of you actually ever venture onto the M25's J 10 via the A3? If you value your life, probably not - it is now increasingly dangerous. Or maybe try to head down the A3 past Guildford? Um, excuse me: WE CAN'T COPE NOW!

It's no use you hoping against hope that the traffic fairy will come along, wave her wand and for your problems to disappear ..

They won't.

Mid Surrey is not some gigantic Monopoly board with bits to be cherry-picked and flogged off to make a fortune - No, it's an example of England at its finest. But won't be if you get your way.
Speaking as one who's rapidly grown to love the place and its inhabitants, it's all too apparent that the good residents of Send and its environs are up in arms and ready to do battle with this intended vandalism ... and frankly, who can blame them?

The developers, who obviously consider themselves 'Oh so clever" have the resources to pay people to keep their applications coming, then revised application compounding revised application, confident that sooner or later we Plebs will get bored of protesting, thus clearing the way for their ugly, cash-rich developments.

Think again ... We won't

Please add my name to the growing list of objectors ..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/615  **Respondent:** 10855393 / Adrian Juste  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As recently as last month it was all going so well for the Tories set fair for a thumping Parliamentary majority around the seventy mark, to provide a rock-solid mandate to do whatever they liked for the next five years. But of course fate decreed otherwise; the PM, along with her equally out-of-touch advisers, crushed that dream in 10 minutes flat by alienating millions of core voters.

However, it seems this same detached thinking continues outside Central government - the regions, especially the moneyed ones, still think they can carry on as though the promised landslide had actually happened. It must be wonderful to be a property developer - sitting there with nothing to do except vandalise the Surrey countryside, eagerly perusing your commissioned aerial photographs, greedily peering at open spaces and green bits - totally oblivious to the wonderful fecundity, streams, woodlands and healthy abundance of wildlife there.

The developer sees none of this - just 'business opportunities' where dozens more houses and yet another Tesco Express can be squeezed in ... no conscience, no altruism ... just flat out greed. In the odd moment of munificence they salve their conscience by proclaiming they create jobs and provide much-needed housing - which translates to jobs for 3 months and houses no ordinary person could ever afford. A property developer's standing on the social pariah scale is now alongside that of your average MP. I know quite a few developers., most of whom are boring, soulless individuals you'd pray you're never stuck in a lift with.
And so, here we go again: the annual battle with you on Guildford Council and your select band of friends, and the whittling away of the Green Belt - which was created for a purpose, by people gifted with more wisdom and foresight than the elected guardians we're blessed with now. I do appreciate your problems on the Council: It can't be easy with government pouring people into the South East year on year They care little - after all, many of its MPs will have their fat pensions and a couple of 'consultancies' to fall back on, leaving some other poor sap to try to sort out the mess they've made.

Viewing your list of proposals on this new Local Plan is very depressing:

The proposed Garlick's Arch and Tannery Lane developments are of particular concern to me. You'd proceed with little or no added infrastructure?! Oh, please! What your plans should include is building roads and services for the villages & communities we have now, not piling yet more straws onto the weary camel's back. Thanks to much-vaunted 'Austerity' (that went well, didn't it??) our infrastructure is grinding to a halt: roads can't be maintained, and paths and road signs completely overgrown, Don't you realise? - WE CAN'T COPE NOW! Or perhaps you just don't care ... even more unforgivable. It's no use you hoping against hope that the traffic fairy will come along, wave her wand - and all your problems will disappear.. They won't.

Mid Surrey is not some gigantic Monopoly board with bits to be cherry-picked and flogged off to your mates to make a fortune - No, it's an example of England at its finest. But won't be if you get your way. Some of your speculator friends, ready to swoop like the greedy vultures they are, don't even know where Guildford is some of them probably aren't too sure where England is - so why should they care what happens to this lovely corner of it? Speaking as one who's rapidly grown to love the area and its denizens, it's all too apparent that the good residents of Send and its environs are up in arms and ready to do battle with this wilful and studied vandalism and frankly, who can blame them? The developers, who obviously consider themselves oh-so-clever, have the resources to pay people to keep their applications coming, then revised application compounding revised application, confident that sooner or later we Plebs will get bored of protesting, thus clearing the way to sneak through their ugly, cash-rich developments.

Think again We won't.

Please add my name to the long list of objectors..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are **no exceptional circumstances** which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is **not** an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1109  Respondent: 10855553 / Emma Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2170  Respondent: 10855553 / Emma Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2172  Respondent: 10855553 / Emma Tallick  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2167    Respondent: 10855553 /Emma Tallick    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2173    Respondent: 10855553 /Emma Tallick    Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2174  Respondent: 10855553 / Emma Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2171  Respondent: 10855553 / Emma Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2166  Respondent: 10855553 / Emma Tallick  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2168  Respondent: 10855553 / Emma Tallick  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1807  Respondent: 10855713 / Janet Holland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my deep concern and anger over the recent new building proposals for Send.

I was saddened by and strongly object to Send being removed from Green Belt status. This will permanently alter the character of the village and will only open the way for yet more building development in the future. One of the main reasons we have chosen to live in Send is the fact it is surrounded by fields which gives it its rural status. With building on the Green Belt land our village feel and status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there. Once lost, it is lost forever!

I am very concerned and strongly object to the way Guildford Borough Council have tried to 'sneak' these plans through without proper consultation. Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in Send has been changed and a massive new road junction added on. I am disappointed in the councils' approach which has been very underhanded and dishonest to the people of Send.

Send already struggles with the large amount of traffic driving through the village which of ten results in long queues and tail backs. The infrastructure will not be able to cope with all these new build proposals. You cannot just take a small village and dump hundreds of houses and large industrial developments onto it and expect it to work. There are not enough school places, it is already extremely difficult to get a doctor's appointment at the medical centre, the roads will be permanently grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3550  Respondent: 10855713 / Janet Holland  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I strongly object to policy A43. 30ha Land at Garrick’s Arch. There is no need for more houses on top of the 13,860 already proposed by the borough. It is Green Belt protected by the NPPF which prevents the merging of settlements. It is covered in ancient woodland with trees dating back to the 16th century and once lost, is lost forever. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Therefore the proposed industrial development of 7000sqm is not needed. The obvious place for any new industrial development is at Slyfield, Guildford - an industrial site already set up and running. There would then be no need to have to build a new 4-way interchange onto the A3 at Burnt Common to serve this industrial development. Surely saving money!  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  

Comment ID: PSLPS16/3552  Respondent: 10855713 / Janet Holland  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I strongly object to policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveller's pitches.  

Where has this come from? It was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoil is documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times. The junction at the bottom of Send Hill already struggles to cope. Adding yet more houses and traveller pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a arrow width single track country road and certainly not built for so much extra daily traffic. Surely common sense dictates this is not a sensible idea.  

Thank you for taking the time to read my concerns. Please do not allow Guildford Borough Council to 'sacrifice' the village status of Send with its beautiful surrounding countryside.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:
Comment ID: PSLPA16/191  Respondent: 10855777 / Ian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the complete lack pf evidence with the alleged housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/621  Respondent: 10855777 / Ian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the idea of linking villages together and killing the heart of surrey as it stands – this is not progress and against government statements on green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/624  Respondent: 10855777 / Ian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the complete lack of provisions on the infrastructure need: Schools, Doctor surgeries, play fields etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>- I object to the building on green belt land altogether (this is against Government stated commitments for Green Belt protection)</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I wish to object to many of the local plans proposals in the “draft local plan” released by Guildford.</td>
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<td>“Government advice is unmistakably clear – that housing needs alone is not adequate grounds for building on the green belt...”</td>
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<td>Having lived in the borough for over 20years with my wife &amp; family, I have seen the area evolve, but this plan is a ridiculous proposal and grossly over numbered. I don’t want to see the area ruined by sprawling inter linked “villages” and miles of houses just because it “looks a good idea on paper”. It’s the “Green-ness” and the many villages that make the area. Kill that with concreate and you will kill the heart of Surrey for ever. This isn’t one of the most expensive places in the country to live for nothing– there is a reason!</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the last minute inclusions of new sites
- Garlick Arch (Policy A43 – 400 houses and industrial units)
- North and south bound junctions for the A3 to the A247 Clandon
- Gosden Hill, Merrow of 2000 houses

I object to the increase in traffic these proposals will have on the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/240  **Respondent:** 10855777 / Ian Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It’s a ridiculous over egged proposal.

- I object to the last under hand inclusion of the new sites with less than a few weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2063  **Respondent:** 10856033 / R Soden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Send from the Green Belt as it would produce suburbia from Woking all the way to burnt common and services could not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2064  Respondent: 10856033 / R Soden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object as schools and doctors surgeries could not cope.

I object to this 2016 draft and would like my comments to be seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4096  Respondent: 10856033 / R Soden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for reasons as follows

1. The underhand and cynical way Guildford Borough Council pushed in a proposal for 400 houses and 7000 sqm of industrial space and a 4 way junction at Garlick’s Arch Burnt Common. This will entail destroying ancient woodland and encroaching on Green Belt Land. This proposal was supposed to be at Slyfield a brown field site altered at the last minute. Anyone local to the area will remember half of send marsh flooded when water came down from Clandon and Newlands corner across the A3 at the dip and flooded Send Marsh as the stream couldn’t cope with the amount of water. Remove the woods and natural soaking system is gone. Concreting over these woods is madness do we need industrial units in this area? So much for protecting Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4097  Respondent: 10856033 / R Soden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new junction at Burnt Common as it would gridlock Send through to Old Woking even more than it is now. Twice a day it's a nightmare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4098  Respondent: 10856033 / R Soden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the 4 way ramp to A3 at Burnt Common as it will accommodate the 7000 homes but will cause no end of chaos to our local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2710  Respondent: 10856353 / David Howells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• Infrastructure - the Plan does now recognise that the infrastructure will need to be expanded to accommodate the proposed new developments, but is vague on the details and the timing of any improvement. In the case of the proposed Gosden Hill development there is mention of a new exit off the A3, but no commitment or requirement that this be in place before any development can begin. There is no mandatory linking to the A247 which would provide an alternative route into Guildford (via the A246); it is therefore possible that all traffic travelling from the new development to Guildford would be routed along the A3100 (London Road) which simply will not cope. The plan goes on to say 'Interventions will be required which address the potential highway performance issues which could otherwise result from the development,' which acknowledges the traffic issue without saying what solutions the Council has in mind. Clarity on this is paramount.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5680  Respondent: 10856353 / David Howells  Agent:
A 24 Double impact with Slyfield Regeneration Project. The impact of any development at Gosden Hill must also be viewed in conjunction with the proposals at Slyfield. More than 20% of new housing in the Draft Local Plan is proposed within a 2 mile radius of Burpham which is hugely disproportionate to this region compared to the borough as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

A25 Density of housing at Gosden Hill (2000 homes plus promised increased infrastructure, albeit in a slightly expanded area since the 2014 Plan) being out of character with that of the surrounding area. This is unlikely to make the development a pleasant place for people to live and will have an adverse knock on effect for the residents of Burpham in terms of traffic volumes and proximity to open space. It is a development with the same number of dwellings as Burpham itself, yet built in an area which looks to be about half the size. The existing community will simply be swamped by a development of this size.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

A25 Density of housing at Gosden Hill (2000 homes plus promised increased infrastructure, albeit in a slightly expanded area since the 2014 Plan) being out of character with that of the surrounding area. This is unlikely to make the development a pleasant place for people to live and will have an adverse knock on effect for the residents of Burpham in terms of traffic volumes and proximity to open space. It is a development with the same number of dwellings as Burpham itself, yet built in an area which looks to be about half the size. The existing community will simply be swamped by a development of this size.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• P2 Impact on the Green Belt; this is a protected area which affects the quality of life for everyone in the borough. It should not be subject to the vagaries of planning and cast aside after decades of preserving our green and open spaces. Better town centre and brownfield site development opportunities exist and should be built out before any impact on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11219  Respondent: 10856353 / David Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

S2 I object to the 2016 Draft Local Plan as I believe that it would be detrimental to the quality of life for those living, or indeed coming to live, in the borough. I made a number of comments at the time of the 2014 draft plan and I am pleased to see that some of my concerns are now acknowledged in the 2016 Draft Plan. I say acknowledged because they are mentioned as issues, but without any clarity as to how they will be dealt with. My objections therefore continue to be:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11224  Respondent: 10856353 / David Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• S2 The assumptions about the number of houses needed by 2033. No doubt this figure, which I already find suspect, was prepared before the Referendum decision to Brexit. Politicians have repeatedly warned that this will cause house prices to plummet (due to falling demand) and that immigration numbers will fall, thus reducing pressure on future housing needs. The housing need should therefore be reassessed in the light of the country's decision to leave the EU.

• S2 I apologise for the brevity of this response to the 2016 Draft Local Plan, but I simply have not had time to consider all 255 pages in the short period of consultation allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 10856385 / Alex Ayscough</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I would like to object to the removal of Chilworth and Shalford from the green belt for the following reasons:</td>
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<tr>
<td>1. It goes against the Fundamental aim of green belt policy i.e. that is to prevent urban sprawl</td>
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<tr>
<td>2. The transport links are inadequate to cater for the proposed developments.</td>
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<td>3. The proposed developments around Old Manor Lane would increase the rate of run-off and the likelyhood of further flooding downstream.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. <strong>EVIDENCE.</strong> GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80 reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is <strong>exaggerated.</strong> If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. <strong>50 of new homes needed could be built on brownfield sites!</strong> GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy of option of removing Green Belt in areas that do not generally affect them directly.</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have strong objections to the latest version of the local plan as recently published and in particular as it affects Send and our local environment.

It seem to me that many of the objections raised a year or so ago, which on the surface seemed to have been taken into account of, have now been completely disregarded in the latest version and several new projects introduced, all of which have an adverse effect on the village. In particular the concept of taking Send completely out of the Green Belt classification.

In my view, we do not need as many houses as the government think, what we need is less people but that is a matter for the national government to resolve with the electorate at large.

I would ask that this letter of objection and my comments below be seen by the Inspector.

1. GBC HAVE NOT FOLLOWED CORRECT

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process and I object strongly to GBC officials completing ignoring the views of the local population who elect them.

2. EVIDENCE

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80 reduction in employment space from the previous ELNA carried out by GBC in This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50 of new homes needed could be built on brownfield sites! GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy of option of removing Green Belt in areas that do not generally affect them directly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1999  Respondent: 10856513 / Janet Kidd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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1. **POLICY A 43.30 ha LAND AT GARLICK’S ARCH, Burnt Common, designated for 400 houses** and 7,000 sq m of industrial and warehousing. I object to these plans as I feel there is no need for any more houses on top of the 13,860 already proposed for the borough. This site is **NEW** and was not included in the Regulation 18 draft and has **NOT** been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80 in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it. In fact, leaving Send Close to join the A247 always takes several minutes due to the traffic loads, during peak times takes a lot longer. The proposals now being brought forward will increase the traffic loads to a huge degree to an unacceptable level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A43 LAND AT GARLICK’S ARCH, Burnt Common, designated for 400 houses and 7000 sq m of industrial and warehousing. I object to these plans as I feel there is no need for any more houses on top of the 13,860 already proposed for the borough. This site is NEW and was not included in the Regulation 18 draft and has NOT been consulted upon previously. It is Green Belt permanently protected by the NPPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80 in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send. Send Road (A247) would be gridlocked all day. Send would be through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. Send cannot take it. In fact, leaving Send Close to join the A247 always takes several minutes due to the traffic loads, during peak times takes a lot longer. The proposals now being brought forward will increase the traffic loads to a huge degree to an unacceptable level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/139  Respondent: 10856513 / Janet Kidd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. 4. Policy A44. 1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 Travellers Pitches. I object to this site as it is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site. I object to the proposals on this site mainly because it is a please country lane but by definition narrow! The addition of unsuitable traffic, coupled with the inherent danger already existing at the Potters Lane end of the Send Hill make the proposals completely ridiculous. Whilst School Places do not affect me personally and others are probably more qualified to speak on the subject, as I understand it many parents did not get their children in to their first choice of St Bede’s, these proposed developments will just make it harder which will mean more traffic on the roads for school runs.

What does affect me is the inability to get a doctor’s appointment in a reasonable time at the Villages Medical Centre now – these developments will add to that pressure, without I would imagine more resources being made available.

So in summary, I object to the proposed unreasonable level of development crammed into such a small area and I hope the review process sees the common sense in keeping the developments to a sensible scale for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3931  Respondent: 10856513 / Janet Kidd  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A44 LAND WEST OF WINDS RIDGE AND SEND HILL** designated for 40 homes and 2 Travellers Pitches.

I object to this site as it is **NEW** and was **NOT** included in the regulation 18 draft and has **NOT** been consulted upon previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site. I object to the proposals on this site mainly because it is a pleace country lane but by definition narrow! The addition of unsuitable traffic, coupled with the inherent danger already existing at the Potters Lane end of the Send Hill make the proposals completely ridiculous. Whilst School Places do not affect me personally and others are probably more qualified to speak on the subject, as I understand it many parents did not get their children in to their first choice of St Bede's, these proposed developments will just make it harder which will mean more traffic on the roads for school runs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/8367</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What does affect me is the inability to get a doctor's appointment in a reasonable time at the Villages Medical Centre now - these developments will add to that pressure, without I would imagine more resources being made available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

|--------------------------|-----------------------------------|--------|--------------------------------------------------------------------------|

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY P2. SEND SHOULD NOT BE REMOVED FROM THE GREEN BELT.** Send provides a buffer between Woking and Guildford and I object to the particularly vulnerable areas of land being taken out of the Green Belt which include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8347  **Respondent:** 10856513 / Janet Kidd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Send provides buffer between Woking and Guildford and I object to the particularly vulnerable areas of land being taken out of the Green Belt which include 1. The land behind the school including playing fields and woodland. 2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering. 3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/151  **Respondent:** 10856513 / Janet Kidd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I have strong objections to the latest version of the local plan as recently published and in particular as it affects Send and our local environment.

It seem to me that many of the objections raised a year or so ago, which on the surface seemed to have been taken into account of, have now been completely disregarded in the latest version and several new projects introduced, all of which have an adverse effect on the village. In particular the concept of taking Send completely out of the Green Belt classification.
In my view, we do not need as many houses as the government think, what we need is less people but that is a matter for the national government to resolve with the electorate at large.

I would ask that this letter of objection and my comments below be seen by the Inspector.

1. **GBC HAVE NOT FOLLOWED CORRECT PROCESS.**

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process and I object strongly to GBC officials completing ignoring the views of the local population who elect them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3741  **Respondent:** 10856673 / Anna Crawford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the proposal in the local plan for the following reasons:

- The site is not large enough for the proposed use
- Send hill is a single track country road and too narrow to accommodate the potential new levels of traffic the proposed development would bring.
- Send is in the green belt, so the proposed inset is inappropriate due to its permanent green belt
- The existing road and parking is already inadequate and under pressure and would worsen with the planning development and the additional cars this would incur, its particularly bad at the school run.
- The proposed plan could increase flood risk as a report march 2004 gave evidence of past ponding in the excavated area and further development would disturb the water table.
- I believe there is a danger that any disturbance would be a health hazard due to unknown materials having been placed in this landfill site.
- Southern County Searchers report Jan 2005 identifies the site as potentially contaminated industrial land with usage of unknown constituents. Changes to the site could cause potential ground water vulnerability to my property.
- Travellers accommodation assessment research purported to have been taken June/July 2012 by hill field services cannot be so. This market research company was dissolved in Jan 2011
- Guildford BC has recorded methane gas discharge since 200

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4907  **Respondent:** 10856769 / Lisa Mardell  **Agent:**
## Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/7911  Respondent: 10856801 / Jennifer Tigwell  Agent:

## Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of houses at Clockbarn Nursery.

The junction with Tannery Lane and the Send Road is permanently busy and potentially dangerous.

It is not an easy junction to get in and out of - at any time of day.

Tannery Lane is nothing more than a country lane. To build additional housing and the proposed Marina, combined with the proposed A3 interchange will undoubtedly have a major and damaging effect on residents and traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/7912  Respondent: 10856801 / Jennifer Tigwell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 400 houses and industrial space at Garlick's Arch.

This is an area of ancient woodland and should remain so.

The junction of the Send Marsh Road and the Old Portsmouth Road is always difficult and at times dangerous.

There is a 40mph on this stretch of road, and we have witnessed many accidents and near misses at this junction in the 26 years we have lived here.

Building 400 homes and an industrial site will have an effect on vehicles trying to exit the Send Marsh Road and will increase the number of accidents/near misses occurring.

There is no requirement for industrial space at this site can and should there be the need then this should be accommodated within the existing site at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7914  Respondent: 10856801 / Jennifer Tigwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the interchange with the A3 at Burnt Common.

This will cause additional traffic congestion to an area which even now cannot at times cope with the volume of traffic and is often gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7913  Respondent: 10856801 / Jennifer Tigwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 40 houses and 2 travellers' pitches at Send Hill.

To build on a site known to contain unsafe landfill waste, which is registered GBC, is simply paramount to recklessness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green belt.

By so doing would have a detrimental effect on the surrounding area(s) allowing developers a "free for all " approach to extend/develop beyond what is required/needed for the area.

We need to maintain a Green Belt buffer zone between Send & Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having lived my entire life as a Surrey Resident I am extremely concerned as to the level and extent of development being proposed for Surrey.

Surrey has always been to me a county of outstanding natural beauty -this needs to remain so.

Surrey has beautiful villages clearly defined by separation by areas of fields & woodlands-this needs to remain so.

The proposal for the developments in and around Ripley & Send and the proposal that they should be removed from the Green Belt will urbanise these villages and in effect will morph both Woking and Guildford together.

Our local services, roads and Doctors Surgery cannot deal with any further increase in development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1111  **Respondent:** 10857217 / Mark Sherwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

House prices and affordability. It is expensive to live in the Horsleys. Would the new homes have government subsidies to make them affordable for people? Other wards in the county have land to build on, green belt or not, and are in designated areas of deprivation. Ash and Tongham are such wards identified by the Council as priority areas to invest and improve. What of house prices? Would so many extra houses stagnate house prices in the villages? Another major reason for being here is that is so desirable, build on the green belt and you reduce that desirability.

I strongly urge you to reconsider, debate and propose a new strategy. One that does not take away our green belt and one that is focused on the wards you have identified as priorities where there is infrastructure to support new housing developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1108  **Respondent:** 10857217 / Mark Sherwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I would like to lodge my objection to the Proposed Local Plan.

I object on the following grounds:

Education. The Raleigh already operates at full capacity with no land to expand into. Places are in demand and extra housing means even more demand. Where would those children go to school and what of the others who would usually fall into the catchment area? Would that shrink to accommodate the increased demand? Furthermore, Surrey County Council has no plans to build new schools in the area.

Roads. The roads in the villages are busy and sometimes dangerous. There's already many housing works taking place with vans and lorries delivering and construction blocking or reducing access. Part of the beauty of the villages is that it's commutable distance to many places of work but isolated enough to have a countryside feel to it. Don't take that away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/3512</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

5. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6802  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6803  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14647  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14653  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14644  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14645  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14646  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14655  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/14651  **Respondent:** 10857249 / Alice Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14648</th>
<th>Respondent: 10857249 / Alice Pashley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14649  **Respondent:** 10857249 / Alice Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14639  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

I have particular concerns about the growth in traffic on our already overburdened roads, in particular the A3, which is frequently gridlocked at peak times, and the A247, which despite its A road status is too narrow to allow for two large vehicles to pass each other. Only last week I witnessed the aftermath of an accident on the A247 and another near-accident in the same place. The unsustainable increase in housing numbers will add to the traffic in a way which the roads cannot cope with.

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14642  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14643  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14640  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running
through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying
sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the
area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach
of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank
rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF
paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact
existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development
proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4509  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4510  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4511  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10857249 / Alice Pashley</th>
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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp17q/571</th>
<th>Respondent: 10857249 / Alice Pashley</th>
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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We need a sensible plan, that supports realistic growth requirements with new housing and infrastructure projects that will create new jobs and transport facilities accordingly. We need to find a balance and respect the countryside around Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7271  Respondent: 10857761 / Daniel & Katy Murphy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Why is that each year I find myself having to write to the council in protest at plans drawn up under your guidance? We live in West Clandon, a beautiful village of historical significance and charm. We use our local facilities and support local businesses in and around the Guildford area, but in order to do this we have to work in areas other than Guildford as there is simply not the infrastructure in our local area to provide jobs for the current level of housing (or suitable, reliable transport links in and out of Guildford), let alone an aggressively expanded plan which you are putting forth once again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1178  Respondent: 10857825 / S Ting  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The land at Guildford Cathedral is currently designated as Protected Open Space. I object to the proposed change in status of this site to C3 housing on the grounds that it would have a significantly negative impact both on the wildlife and local community, and also importantly would ruin the vista of Guildford Cathedral, a historic landmark for Guildford and tourist attraction.

The proposed development of 100 dwellings at Guildford Cathedral would negatively affect the local community in terms of:

- Significant traffic congestion on Guildford Park Road leading into the town centre and out towards the A3 will only worsen due to the developments proposed in and around Walnut Tree Close, Guildford Station, along Farnham Road and Cathedral land. Given the recent road traffic accidents around the Friary Centre which
resulted in a fatality and serious injuries, proposed development of the Cathedral land would result in congestion on Alresford Road, Benbrick Road and Ridgemount which are not equipped to deal with the throughput of vehicles from a further 100 dwellings, making it quite unsafe for pedestrians and the local community comprising of children. Moreover, the inadequate pavements in the area and bus depot at the bottom of Ridgemount makes it difficult and potentially unsafe for cars and pedestrians as buses manoeuvre in and out of the premises.

- Inadequate local infrastructure including schools
- Damage to local housing in Alresford Road, Benbrick Road, Ridgemount and Scholars Walk due to problems related to subsidence and inadequate draining.
- Damage to natural wildlife

Given the large number of proposed new dwellings for Guildford town centre, Onslow and surrounding areas, it is even more crucial that the Protected Open Space at Guildford Cathedral remains protected to ensure the health and wellbeing of the local community, natural wildlife and reputation of Guildford city and its historic landmark.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/8853</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I PART OBJECT, PART SUPPORT this policy**

I support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings but object to the lack of reference to design criteria, vernacular or historic guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy

The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed.

The building of dormitory towns is unsustainable and will require increased car use. This will lead to increased congestion, more air pollution and higher carbon dioxide emissions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8855  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I PART OBJECT, PART SUPPORT this policy

The policy appears reasonable.

However, conserving and enhancing the historic environment may be damaged by supporting ancillary development.

In historic locations this policy needs to have an overriding emphasis on protection rather than supporting development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8856  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed.

There is a need for expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
The number of homes planned in the urban area is too low. There is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites. Over cramming and alien high-rise developments in the town must be avoided.

The plan envisages a large expansion of the traditional retail sector, but this is a sector in long term decline, which will continue to accelerate with the growth in online shopping.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8857  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy.

The evidence base is flawed and unreliable. Only high added-value business uses are desirable and the rural environment should not support general industrial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8858  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy as it stands.

I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8859  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy

I do not support the policy of resisting change of use from B1a to residential which is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8860  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4: Surrey Research Park

I PART SUPPORT, PART OBJECT to this policy

I support the maintenance of research, development and design activities, in any science including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park.

I OBJECT to the expansion of the Research Park into a larger Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8861  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5: Rural Economy

I OBJECT TO THIS POLICY as written

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which means that local people should be consulted and heeded. Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8862   Respondent: 10857889 / William Kyte OBE   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6: The leisure and visitor experience

I OBJECT to this policy

Tourism and visitors do not depend on new visitor attractions and facilities which will undermine the area. Overdevelopment will destroy the very things that make Guildford a very desirable place to live, work in and to visit.

Guildford, surrounded by the natural beauty of the Surrey Hills, is already distinguished as an historic county town. The historic part of the town should be exploited to the full. This should be linked to the attractions of the Museum, the Castle, the River Wey and the historic High Street including its views of the Hogs Back.

Guildford should model itself on other historic towns like Bath, Chester and York by capitalising on its unique strengths.

It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8863  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre

I OBJECT to this policy

There should be much more residential use of the town centre. There is a very limited need for further retail, which will disadvantage existing retailers and the unique High Street.

The town centre lacks essential shops such as butchers, grocers, bakers which need support.

A central bus station and shuttle must be provided and priority must be given to bus/rail interchange to enable sustainable transport

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8864  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8: District and Local Centres

I PART OBJECT, PART SUPPORT this policy
I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre.

I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated.

I do NOT support consideration of sites on the edge of district centres for town centre uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8865  
Respondent: 10857889 / William Kyte OBE  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9: Local Centres

I OBJECT to this policy

I think that retail development adjacent to the six rural centres should be small and in keeping with the local character and scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8866  
Respondent: 10857889 / William Kyte OBE  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

I OBJECT to this policy

The housing mix is based on the flawed assumptions and calculations in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised nor evaluated.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I OBJECT to this policy

Affordable homes, under national definitions, means homes which are sold or rented at 80% of market value. This means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable.

There is a need for more social housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I OBJECT to this policy

Affordable homes, under national definitions, means homes which are sold or rented at 80% of market value. This means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable.

There is a need for more social housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy H3: Rural exception homes

I OBJECT to this policy

This policy allows potential development outside settlements even in the Green Belt and includes wording to propose extension of this policy for market housing. This policy seeks to introduce a scheme where housing could be built anywhere, with no restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy I1: Infrastructure and delivery

I OBJECT to this policy as it stands

Various aspects of infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Areas identified as SANGS should not be developed and urbanised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

I OBJECT to this policy as it stands.

Very significant traffic constraints should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy I3: Sustainable transport for new developments

I PART SUPPORT, PART OBJECT to this policy.

I support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered.

A central bus station and shuttle bus service in the town centre are essential for existing development and are crucial before any new development.

While I welcome the intention to encourage rail travel by adding two new stations, there could be unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy I4: Green and blue infrastructure

I OBJECT to this policy

The Policy shows concern for conserving and enhancing biodiversity, which is welcome.

There is no mention of the impact of the plan on food production, or of monitoring the loss of agricultural land.

The River Wey must not be subject to overdevelopment which would destroy its naturalness and a green corridor must be preserved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8874  Respondent: 10857889 / William Kyte OBE  Agent:

Policy P1: Surrey Hills Area of Outstanding Natural Beauty

I OBJECT to this policy as it stands.

Whilst I welcome the inclusion of a policy to protect the AONB in the draft Local Plan, I OBJECT to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

It does not protect natural beauty which is the prime reason for the existence of the AONB.

The Surrey Hills needs much more substantial protection. Even major development in the AONB would be permitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8875  Respondent: 10857889 / William Kyte OBE  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

**Policy P2: Green Belt**

I OBJECT to this policy.

This ignores the Green Belt as a constraint as set out in the NPPF and has weakened the interpretation of exceptional circumstances.

Villages should continue to be washed over by the Green Belt in order to preserve their integrity and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8876  Respondent: 10857889 / William Kyte OBE  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**Policy P3: Countryside**

I OBJECT to this policy as it stands.

There is an emphasis on provision both of services and of additional Green Belt in Ash and Tongham. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<td><strong>Policy P4: Flood risk and water source protection zones</strong></td>
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<tr>
<td><strong>I OBJECT</strong> to this policy.</td>
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<tr>
<td>There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate.</td>
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<tr>
<td>More attention needs to be given to adaptation measures.</td>
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<tr>
<td>Areas subject to severe flood risk could be used as public open green space.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Policy P5: Thames Basin Heaths Special Protection Area</strong></td>
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<td><strong>I OBJECT</strong> to this policy.</td>
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<tr>
<td>This policy is weak.</td>
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<tr>
<td>SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space, which could be destroyed by urbanisation in order to spend the developer compensation received.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</table>
**Policy S1: Presumption in favour of sustainable development**

I OBJECT to this policy.

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development. It also fails to balance the three prongs of Sustainable Development (economic, social and environment) being heavily biased to economic development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/8880  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy S2: Planning for the borough – our spatial development strategy**

I OBJECT to this policy.

13,860 homes are proposed. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area.

It is inappropriate to allocate this housing number, either over the plan period or across projected sites, when the number is unsubstantiated.

Eminent external consultants and members of the public have shown that the OAN is flawed and overestimates the housing need.

Furthermore constraints, which are especially needed in a gap town, have not been applied

If the housing number were substantially lower, and only met real housing need, there would be no need to build on Green Belt or open countryside, or to over cram the town with high-rise buildings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID:** SQLP16/1227  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment (SHMA) overstates housing need. The Green Belt and Countryside Study uses a flawed approach. The Transport evidence is too late and incomplete to inform the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** SQLP16/1228  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The Plan shows inadequate regard to national policy which attaches great importance to the openness and permanence of the Green Belt. The test of exceptional circumstances has not been rigorously demonstrated. The Sustainability Appraisal has not applied the concept of sustainable development.

The Plan has had such substantial changes since the last Regulation 18 consultation that it should be subjected to a further Regulation 18 consultation.

The Local Plan has been prepared against a predetermination by the GBC Executive to ‘roll back the Green Belt’ which has destroyed objectivity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
**Comment ID:** SQLP16/1229  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

It is unsound and unsustainable to develop on the scale proposed. The housing target and substantial increase in retail space should be reduced to take account of the constraints and the growth in online retailing.

Sustainable transport cannot be realised without a central bus station and a proper bus/rail interchange.

The implications of Brexit need to be considered and taken into account.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1230  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

A number of issues, which will impact on the Guildford Local Plan, have not been addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1231  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
The views of residents have been largely ignored and need to be addressed at the Examination. Responses to previous consultations need to be taken into account as respondents are now suffering from consultation fatigue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp173/455</th>
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The changes to the evidence base do not address but perpetuate the flaws that have been identified by previous comments in the last consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The changes to the policy are presented as a reduction in the development proposed. In reality, the changes are only a postponement into the next plan period and the same amount of Green Belt has been taken for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The changes to the policy are presented as a reduction in the development proposed. In reality, the changes are only a postponement into the next plan period and the same amount of Green Belt has been taken for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1726  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no justification for deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design….

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1724  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes expanding the research park are not necessary if the existing space is used efficiently.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1718  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes have weakened this policy. The University should be required to accommodate at least 80% of its students on campus; it already has sufficient land to do so.

The paragraphs relating to density have been deleted. To ensure developments make appropriate use of space there must be a policy to ensure that densities are consistent with local character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy has been weakened by deleting the requirement for 40% affordable homes on some developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes weaken the permanence of affordable homes in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td></td>
<td>The policy relating to Surrey Hills AONB weakens the protections offered, and, unlike in previous drafts, does not have restrictions on non-major development. Previously all proposals were considered against the 5 key tests – now development in the AONB has been made more acceptable. The changes do not include the government policy that views into and out of an AONB should be protected.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: pslp171/1722</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td></td>
<td>The new paragraph (1) effectively destroys the concept of Green Belt permanence. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: pslp171/1723</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
The changes essentially preclude building in these brownfield areas. Suitable designs can protect against flood risk and free up land for suitable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/317  Respondent: 10857889 / William Kyte OBE  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan remains unsound because it is based on flawed evidence and constraints have not been properly applied which lead to an overestimated housing figure. Some of the changes made in this draft exacerbate this.

The 2107 Draft Local Plan is still deeply flawed and should be rejected to enable these flaws to be corrected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1078  Respondent: 10858273 / S.M Southall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Your papers also contain comments on the type of housing that you would wish to see in the Horsleys. Here again your approach is flawed as 533 new homes of the type you describe would be wholly out of keeping with the village. It is an observable fact that many Horsley houses are large and on large plots and that is why people have bought them. Furthermore, you reflect this fact in the heavy Council tax bills we pay from which Horsley residents derive few benefits.

You need a major re-think and a concentration on the more than adequate brownfield sites in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3812  Respondent: 10858273 / S.M Southall  Agent:
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<tr>
<th>Comment ID: PSLPP16/3811</th>
<th>Respondent: 10858273 / S.M Southall</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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</table>

Stated Government policy is that areas should only be taken out of the Green Belt in exceptional circumstances and you have not demonstrated that those circumstances apply in the case of the Horsleys. It is accepted that on your planning watch you have permitted some infill development in the main East Horsley village, but south of the A246 there have been no extra dwellings in decades. Indeed, you have previously advised me that the Warren and Rowbarns Way are in an Area of Outstanding Natural Beauty - i.e. the Surrey Hills. In the circumstances, how can you possibly permit a re-designation from AONB status to a planning free-for-all; that would be an act of quite inexcusable planning vandalism?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPS16/6226</th>
<th>Respondent: 10858401 / Philip Kite</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

Re: New local plan

I am writing regarding the revised local plan you have recently published which, despite its volume (no doubt designed to befuddle those who elect you), appears to wholly ignore earlier feedback and to contain fatal flaws.

Firstly, as regards likely population demands, your projections (such as they are) need to be re-visited in the light of Brexit. Your proposal for up to 533 new homes in the Horsleys with possibly another 2,000 on the Wisley site (under two miles away) would represent a disgraceful urbanisation of what is still a predominantly countryside area, with little thought given to the infrastructure consequences and certainly no guarantees that these will all be addressed in advance of any building.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Comment ID: PSLPS16/6224</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The Wisley airfield site development site is unsustainable but assume that the RHS favours the potential increase in membership.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Garlicks Arch is a late inclusion on green belt land.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The propose A3 on ramp will only increase traffic through an already over used village.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Ripley IS in the green belt and should stay there….. Cannot see me voting Tory at next local elections…</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Yet another unsustainable local plan, why is it always Ripley?</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Ripley has already done more than its fair share of new building(over 100 new builds in the last few years), take the burden somewhere else.</td>
</tr>
<tr>
<td>Now that we are out of Europe will we need this extra housing anyway?</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</tbody>
</table>
I would like to inform you of our objections to the New Local Plan 2016, especially in relation to the proposed developments at Wisley Airfield and also to the proposals for more than 500 new homes in East and West Horsley. We believe that these proposals, which would remove the Horsleys from the Green Belt, are a significant over-development and would totally swamp an already overloaded infrastructure - I've had my wing mirror knocked more than once at the Ockham Road South 'pinch-point', heaven help us if it has to withstand the traffic required to construct an entire new town!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It's not too late to go back to the drawing board and avoid years of being thought of as the administration that ruined so many lovely areas. We'd all accept some development - but please keep it in fair proportion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/661 | Respondent: 10858657 / Fiona Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of evidence for the number of houses required

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/663 | Respondent: 10858657 / Fiona Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the idea of linking villages together and killing the heart of surrey as it stands – this is not progress and against government statements on green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/662 | Respondent: 10858657 / Fiona Gray | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase in traffic these proposals will have on the area
- I object to the complete lack of provisions on the infrastructure need: Schools, Doctor Surgeries, playing fields

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the destruction of irreplaceable ancient woodland
- I object to the destruction of habitat for wildlife

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/660  Respondent: 10858657 / Fiona Gray  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to lodge my objection to the 2016 local plan for Guildford,

**The Green Belt was put in place to**

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- I cannot understand how the draft local plan abides by what the Green belt is meant to be and so I strongly object to what is being proposed
- I object to the building on green belt land altogether (this is against Government stated commitments for Green Belt protection)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/251  Respondent: 10858657 / Fiona Gray  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the last minute inclusions of new sites
- Garlick Arch (Policy A43 – 400 houses and industrial units)
- North and south bound junctions for the A3 to the A247 Clandon
- Gosden Hill, Merrow of 2000 houses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5761  Respondent: 10858753 / Carole Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the development of Thatcher’s Hotel, Horsley
This would result in loss of a Hotel Site, impacting local businesses.
The proximity to Grade II listed Horsley Towers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5760  Respondent: 10858753 / Carole Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the development of Waterloo Farm, Horsley

Planning permission for 3 dwellings was rejected in 2014

The land is regularly flooded and waterlogged

The area is categorised as a Paddock, with mature trees and wildlife.

There is insufficient access routes for households or emergency services.

120 dwellings would have massive impact on traffic on the Ockham Road

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11658  **Respondent:** 10858753 / Carole Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object due to the negative impact on character of the area

The plan will have a harmful and detrimental impact on the area, impacting the character of the area and villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11657  **Respondent:** 10858753 / Carole Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the plan on the grounds of insufficient infrastructure around local services

The plan fails to identify adequate infrastructure improvements to support the huge scale of development.

Local services such as Doctors, Dentists, Nurseries, Primary and Secondary Schools are all operating at capacity, or close to capacity.
Utilities and Sewerage, Rain Floodaways, Increased road and rail usage, all need to be accounted for.

The impact on Police and other Emergency services and access routes need to be considered, but there are inadequate plans to meet these demands.

Within Horsley there is just the single Doctors Surgery, and organising an appointment is currently very difficult, so further households will stretch these services to breaking point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11655  Respondent: 10858753 / Carole Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as it will increase congestion on road infrastructure that can't cope

The area has too much road traffic at present, and the rural roads are in poor condition through overweight traffic (lorries and coaches) damaging the surface, particularly evident in our local area along East Lane, and the Drift, Horsley.

An increase in housing as proposed will lead to a substantial increase in cars, and in turn traffic. Leading to congestion, increased traffic noise, traffic pollution, increased accidents and a detrimental effect to the environment both physical and social.

I object on the grounds that there is insufficient rail infrastructure

Parking at both Effingham and Horsley Train Stations is currently at capacity, with no room for further parking during peak hours.

I object due to the congestion that the actual development will cause

Before any development can commence, trunk roads and access routes to the areas would need to be improved to enable the access of vehicles.

There are no such plans for the A3 and M25 and the local rural roads can't handle the construction traffic.

I object due to insufficient plans for meeting commuter needs

Without a regular bus network, footpaths, cycle ways, sufficient train frequency, increased road network, then the proposed plan will not be able to accommodate the needs to commute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| I object to the local plan as it does not protect the green belt. |
| Multiple villages and their surrounding areas will be removed from the green belt, resulting in urban sprawl. |
| Villages will lose their identities as a result of their sprawl. Ancient Woodland will be destroyed, wildlife will be impacted due to the loss of their natural habitat. |
| For instance at the site of Waterloo Farm there are regular sightings of Deer, Peacocks and Rabbits along with a variety of birds. |
| The plan should concentrate solely on brownfield sites, leaving the current green belt intact. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/11656  Respondent: 10858753 / Carole Warren  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| I object to the local plan as many of the proposed sites are in areas at risk of flooding |
| Insufficient accounting of flood risk has been taken, a number of the sites are on or near flood planes, and have been classified by the Environment Agency as at High Risk of Flooding. |
| One site - Waterloo Farm - local to our address, has its paddock regularly under water after heavy rainfall, thus are not suitable for housing development. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPA16/2013  Respondent: 10858945 / C P Faithful  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have particular objections to:
Removing Horsleys from Green Belt status.
Changing the settlement boundaries in the Horsleys
Planning with no regard to the infrastructure necessary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3946   Respondent: 10858945 / C P Faithful   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common and Gosden Hill Farm developments are inappropriate and will overrun the local communities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3945   Respondent: 10858945 / C P Faithful   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Development of Wisley Airfield into a 2000 house village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8444  Respondent: 10858945 / C P Faithful  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Classifying Station Parade, East Horsley as a District Centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8441  Respondent: 10858945 / C P Faithful  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford New Local Plan

This proposed plan places impossible burdens on the Horsley area and will create an unsustainable load on services, facilities and lifestyle in the area.

The Plan is based on unverifiable data not in the public domain and is based on forecasts not substantiated by any real facts.

The Plan should be revised with real facts and figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1209  Respondent: 10858945 / C P Faithful  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You will receive objections with far more detail than ours but we feel that the points raised above demonstrate our discomfort with the proposals and distrust of the organisation behind them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/4527  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**DEFINITIONS AND SOURCES**

To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

GBC refers to Guildford Borough Council

SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn

OAN refers to the Objectively Assessed Need in relation to housing
NPPF refers to the National Planning Policy Framework
CPRE refers to the Campaign for the Preservation of Rural England
GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils
SSAG refers to the Save Send Action Group which comprises over 500 residents
ELNA refers to the Employment Land Needs Assessment 2015
NPPF refers to the National Planning Policy Framework
NPPG refers to the National Planning Policy Guidance
VoA refers to the Valuation Office Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4526  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**EVIDENCE BASE**

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows,
- the way it considers students and affordability, and
- the flaws in the method for estimating the number of homes needed to support job growth
- the treatment of vacant property

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.
The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

I believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I attach the reasoned objections to the whole dreadful Guildford Plan which is opposed by virtually all the Villages Around Guildford and most of the Guildfordians and our local MP Sir Paul Beresford. Compiled by Andrew Procter.

Finally the most important objection:

I OBJECT to Send village being removed from the Green Belt.

This fantastic legacy from our Victorian Philanthropists was always intended to be permanent, as required by the National Planning Policy Framework. There are no special circumstances to justify abandoning this fantastic legacy.

The Green Belt in Send provides an ESSENTIAL Buffer, stopping Woking and Guildford becoming one conurbation. The GBC Councillors and Government gave clear election promises to protect the GREEN BELT. This plan blatantly reneges on those promises, and goes against Government Guidelines as pointed out by Sir Paul Beresford our local MP.

This would be a Developers Charter to provide unlimited development all over our Village and some other villages too.

Please do not make this woefully ill-conceived error, which will be irreversible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Objection to GBC Local Plan 11 July 2016.doc (261 KB)

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I object to ALL Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>10858977 / Angela Otterson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A25 Gosden Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

- **Purpose 1** - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

- **Purpose 3** “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

- **Purpose 5** - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would...
impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB.” I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8262  Respondent: 10858977 / Angela Otterton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A35 Wisley

I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 45 houses at Clockbarn Nursery.

There is inadequate access and high local traffic volume.

Planning permission has been given for 64 apartments at the Tannery and for building the Marina. This will generate additional heavy traffic. By adding another 45 houses, this will greatly add to the traffic already there. It will be even more chaotic. The junction with Send Road is already very dangerous for vehicles joining the Main Road, this proposal will make it even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 400 Houses and 7000sq meters of industrial Space at Garlicks Arch opposite Send Marsh Road.

This is Green Belt Land with Ancient Woodland, and is prone to considerable flooding. The industrial space is definitely not needed as there is adequate space at Slyfield Green, and the owners at Slyfield are keen to have extra use there if there is in fact a need at all for extra industrial Space.

If GBC used the brownfield sites this Green Belt land would not be needed.

The gridlock that this development would cause on the local Roads would be massive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy A43 Garlick’s Arch

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/6943  Respondent:  10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate?  (), is Sound?  (), is Legally Compliant?  ()

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this proposed new interchange with the A3 at Burnt Common because much of the traffic to and from the A3, the M25, Woking and Guildford would be going through to Send Road which is already at full capacity. It would be total gridlock as this road funnels into a small roundabout and very small congested roads in Old Woking.

The proposed junction would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm, this would be a total disaster for the Village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6942</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the development of 40 houses and 2 Travellers Pitches at Send Hill.

A totally inappropriate location with very narrow Roads with single tack roads with insufficient access.

The subsoil here contains documented unsafe landfill waste registered at GBC.

This development would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8266  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy A44 Send Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring.

The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials. A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes concern as to what it does contain and the dangers if disturbed.
An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has "areas of potentially contaminative industrial activities" and "potential risk from landfill gas migrations". Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8267  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A46 land to the south of Normandy

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints

There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough.

There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. This will impact viability if contained in site (65 ha approx) - there is not an additional 10 ha in currently proposed SANG pre-allocated schedule in infrastructure report (Russell Place Farm)

There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" - the previous PINS decisions in three appeals asserts "openness". GBC state there is no "openness" yet all land parcels in the site are 'red' sensitivity in GBCS Vol 2 Addendum 1 & 2 and all contribute to the 3 key purposes of the Green Belt.

There is a failure to engage with Rushmoor under the duty to co-operate rules in regards of traffic impact from Aldershot Urban Extension (3,800 homes) The increased commuting to Guildford plus new local vehicles (1,375 estimated) will take the A323 to over design capacity and produce perpetual congestion

The one railway bridge in Glaziers Lane + 1 railway tunnel in Westwood Lane on North Downs line are restricted (tunnel single lane) with poor geometry and have poor safety records with one fatality in last 15 years and there is no plan in the infrastructure report to widen bridge or replace tunnel (Network Rail). This will lock traffic from new development within site to the north of Flexford. C and D class roads are not designed for volumes indicated in Scenario 5.

The flood risk will be significantly increased when land is developed. The site lies on the Hogs Back spring line and the land is natural SuDS. There is a stream running through the site with flood risk 3a. Civil engineering mitigation is unlikely to be effective.

The site will introduce 300+ dogs and 250+ cats within 1km of TBHSPA and SANG will not stop increased disturbance and predation on the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy D1 Making better places

I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more
greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18607  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18608  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is a sad voice from the past because the sector is in rapid and continuous decline.

All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

A head of brownfield should be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:
- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18596  Respondent: 10858977 / Angela Otterson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield.

I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.
What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses. **I object** to the policy of creating a Strategic Employment at Garlicks Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10858977 / Angela Otterson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object** to policy E2 location for new employment floor space

I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.
I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

I do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into yet another Business Park for office users rather than research organisations.

A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy E3 maintaining employment capacity

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic.

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015).

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

Guildford is in dire need of increasing town centre residential development. The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18599  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.
I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

The Surrey Research Park currently extends to 65,000 sq m

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/18600  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18601  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy E6 the leisure and visitor experience.

I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York.
The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18602  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E7 Guildford Town Centre

I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

Policy E7 is an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new
focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 year.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent retail study reports a fairly bad time for retail, the bullets below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Despite the findings about retail we are told “evidence suggests that high quality schemes will continue to prosper.” What evidence?

Para 3.33 “the latest 2013-14 Javelin VenueScore17 ranks Guildford Town Centre within the UK’s top 50 shopping locations at 33. By contrast, Kingston-Upon-Thames is ranked 17th. Since 2007, Guildford Town Centre has fallen 20 places in the Venue Score ranking”

Para 3.40 “The growth of online shopping is also impacting on the vitality and viability of many of Britain’s centres and high streets. This is placing pressures on rental growth and market demand in many centres, particularly secondary centres outside the ‘top 100’ shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined, from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next “wave” of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper.” Is this not an aspirational assumption?

Para 3.41 “Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to ‘reach’ their customers and grow their businesses.” Who are these industry experts? Is this not an outdated concept and merely an aspiration of the British Council of Shopping Centres (BCSC)?

Appendix 6 of the Retail Study indicates potentially inaccurate demand data

Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”

The Appendix 6 list of retailer demand looks impressive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princessse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. However, if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and the majority are hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
GH Pressley & Sons – Watches and Silver- Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford.

Oxygen Red Ltd – Ladieswear- Requirement “Oxygen Red is looking to acquire temporary stores in Shopping Centre locations within the M25” Guildford is well outside the M25.

The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 30% of this alleged Carter Jonas requirement would survive proper scrutiny.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18603  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy E8 District centres

I object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to Policy E9 Local centres

I object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18589  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to policy H2 Affordable homes.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will
reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/18590  Respondent: 10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/18609  Respondent: 10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy I1 Infrastructure and delivery

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the A25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.
In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5..indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

- Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3)
- Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/ B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).
- Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)
- Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7).
- Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.
- Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).
- Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.
- Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.
The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. **Congestion will worsen.** The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attended documents:

### Comment ID: PSLPP16/18610  Respondent: 10858977 / Angela Otterson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attended documents:

### Comment ID: PSLPP16/18611  Respondent: 10858977 / Angela Otterson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy I3 Sustainable transport for new developments

This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

**ABSENCE OF POLICY ON RIVER WEY**

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

1. It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
2. The special character of the landscape and townscape in the corridor is protected or improved;
3. Views both within and from the corridor which contribute to this special character are protected or improved;
4. Where appropriate, public access is provided to and along the River and the Navigations.
5. The Nature Conservation value of the site is protected or improved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18591 **Respondent:** 10858977 / Angela Otterson **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

- “All proposals will be considered against whether they…”
- “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:
• “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

• “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
• “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
• In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18592  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is completely false.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.
Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines

Benefits to public health and well being, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.
I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18593  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is
presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18594  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18595  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas.

SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18586  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object** to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target **without any application of constraints** as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 **applies a constraint of 50%** from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. **Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.**”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to **510 homes per annum**.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA
report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

- the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
- there should be no increase for affordability above basic demographic change.
- there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
- the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.
The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

“we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.
It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

I have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to ratify the current government policy of protecting the Metropolitan Green Belt and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years.

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister in waiting, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2117  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key parts of the evidence are missing, flawed or based on withheld assumptions.

The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2118  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?
Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/2119  **Respondent:** 10858977 / Angela Otterton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**SUMMARY**

I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target **without any application of constraints** as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I am concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.
In my opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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- I object to the identity of Send from the Green Belt.
- I object to the number of houses to be built, increasing the number of cars with an already congested local roads.
- I object to the number of houses and the lack of infrastructure to support families, to include schools, GP surgeries and small narrow roads.
- I object to GBC trying to destroy my quality of life by increasing stress levels by reducing our very valuable green spaces.

As a Send resident I object to policies A42, A43, A43a and A44 of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2304</th>
<th>Respondent: 10859233 / Alex Davies</th>
<th>Agent:</th>
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Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plan.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   b. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
   c. The increase in already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   e. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   f. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the reversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1041</th>
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<th>10859265 / Neil Haxton</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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3) I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/1567</th>
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4) I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5) I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7) I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3492  Respondent: 10859265 / Neil Haxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Living in this community, we are already faced with traffic flow issues, over stretched health and education services, and a rapidly diminishing green belt which the proposed developments would only add to these issues.

My main objections are;

1) I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/687  Respondent: 10859265 / Neil Haxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/3213</th>
<th>Respondent: 10859265 / Neil Haxton</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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**I object to the Policy A42 change at Clockbarn in Tannery Lane because,**

The increase to 60 homes in place of 45 homes is 33% more, therefore a significant increase on stretched area and too much for the area and therefore making the current access and traffic problems affecting Tannery Lane and A247 junction during rush hour and school drop off/collection worse.

The current removal of the Green Belt in our village will increase, and there will no longer be views of the River Wey Navigation that we and our children currently enjoy.

Surface water flooding which is already an issue, will potentially worsen.

The previous objections by the local people to this have obviously been ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/3214</th>
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**I object to the Policy A43 change at Garlick’s Arch because:**

It makes no reference to and ignores all the previous objections made by local people who will have to live with the consequences.

There is no known demand for 6 Travelling Showpeople plots in this location.

This is permanent Green Belt and no “exceptional circumstances” for its removal exist, and, if this occurs, Ripley and Send will no longer be separated and therefore the purpose of Green Belt will no longer exist as well.

It will cause over-development and destruction of our village and 400 homes is excessive, causing excessive traffic which the roads of Send and Ripley cannot cope with. The roads are currently at breaking point and this can only make matters worse.

It is beautiful ancient woodland that existed at the time of Elizabeth 1 and should be left alone for future generations.
This is currently a flood zone 2 allocation and already has frequent flooding
There is contamination by lead shot accumulated over fifty years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3215  Respondent: 10859265 / Neil Haxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

It was deleted from the 2014 draft due to all the previous objections

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a reduction in need for industrial land

As there are currently empty sites and units at Slyfield and Guildford there is no reason to build industrial or warehouse development in the middle of the Green Belt land

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not an over allocation of 10 hectares at Send in the Green Belt.

The impact on surrounding roads will create traffic chaos and join up Send and Ripley to defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1513  Respondent: 10859265 / Neil Haxton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because:

This is an old non-conforming user in an area of outstanding countryside next to the beautiful Wey Navigation

There is highly restricted vehicle access along Tannery Lane in both directions that would not accommodate any increase in volume or type of traffic

Any increased expansion or development at this site detracts from the Green Belt and is completely inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/3261  **Respondent:** 10859393 / Teresa Neasmith  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write to object to the Local Plan for East and West Horsley.

I believe that the Horsleys should remain as Green Belt. The exceptional circumstances required before taking this action have not been demonstrated.

There are no sound reasons for the boundaries of the settlement areas to be changed.

Infrastructure in Horsley is already overloaded. Local schools are full, drainage is inadequate, roads and car parks are overloaded.

Station Parade should not be designated as a District Centre. The nature facilities in the village centre have been misread.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/6400  **Respondent:** 10859393 / Teresa Neasmith  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to the development of over 2,000 houses at Ockham. This will have a huge and devastating impact on Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2828  Respondent: 10859425 / Barbara Sansom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to your plan.

Horsleys are in the Green Belt and there are no proven reasons for removing this protection.

The Horsleys are already crowded to the extent that local children cannot always obtain entry to local schools.

The Medical facilities are exceedingly stretched.

Winter time the roads are often under water because of inadequate drainage.

In short the Horsleys cannot cope with more houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1426  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SHMA

I object to the huge housing number need put forward by GBC. The definitive SHMA that has been produced for Guildford Borough Council by G L Hearn and sets a requirement of 13,600 homes for the Borough is questionable. GBC has been less than transparent in informing the public how this figure is arrived at and admits that they themselves have not
I object that GBC is not applying any constraints to the housing number. Neighbouring Boroughs are doing so. Guildford Borough is almost wholly Greenbelt with large areas of outstanding natural beauty, good quality farmland, sites of special scientific interest and SPA’s. It has many acres of river and canal frontage as well as ancient woodlands. It is rich in wildlife and home to rare species. Many sites are also prone to regular flooding. All this in itself should invite definitive constraints.

Furthermore the narrow country lanes and village infrastructure cannot and will not cope with the level of development proposed. It is unsatisfactory and, in fact, dangerous to hand 'constraints' over to developers. These same would be developers are already, in the case of Wisley, advertising the new homes at Wisley in local cinemas. This level of disregard for reality bodes very badly for the future of our borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the huge housing number need put forward by GBC. The definitive SHMA that has been produced for Guildford Borough Council by G L Hearn and sets a requirement of 13,600 homes for the Borough is questionable. GBC has been less than transparent in informing the public how this figure is arrived at and admits that they themselves have not scrutinised the calculations. This has been critically examined by further expert investigation. It is inflated by the inclusion of dubiously arrived at numbers based on student numbers, immigration and a heavily weighted growth agenda.

I object that GBC is not applying any constraints to the housing number. Neighbouring Boroughs are doing so. Guildford Borough is almost wholly Greenbelt with large areas of outstanding natural beauty, good quality farmland, sites of special scientific interest and SPA’s. It has many acres of river and canal frontage as well as ancient woodlands. It is rich in wildlife and home to rare species. Many sites are also prone to regular flooding. All this in itself should invite definitive constraints.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

FINALLY

I believe this plan is ill conceived, uses misleading data and contains many fundamentally flawed assumptions and errors. I do not believe it can be achieved and as a template for the Borough going forward it gives a depressing glimpse of a chaotic future where a great deal will be lost for short term gain in the hands of the few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**SEND**

I object to all the proposals for development in Send on the grounds that none were included in the 2014 draft Local Plan and that these fundamental changes and last minute inclusions have not undergone proper consultation.

I object to the removal of Send and other villages from the Greenbelt. Send specifically and in conjunction with development at Gosden Hill is in the front line as a link village between Guildford and Woking. This plan to infill Greenbelt land will effectively join up the towns thus creating exactly the type of urban sprawl the Greenbelt was created to avoid.

**Garlick's Arch, Burnt Common**

**Proposed Interchange on the A3**

I object to this policy because it will significantly increase traffic flow through Send. This is already at a standstill at peak hours and this will mean gridlock. The narrow through road with no capacity for widening means that there will be increased danger to cyclists and pedestrians and a further reduction in already polluted air quality.

I object to this policy because there has been no adequate transport assessment and the supporting evidence is sketchy, incomplete and unreliable.

The proposed development of 400 homes at Garlick's Arch
I object to the development of so many homes on this site. There is no proven need for this number of houses. It is inappropriate and will overload facilities in the village. There are no special circumstances which would support this development.

I object on the grounds that this site at Burnt Common floods every year. Building would create problems for other areas of the village and potentially the road networks as well.

I object to this development on conservation grounds and am surprised that it should be considered.

The area covered in ancient woodland with trees dating back 400 years.

The Proposed Industrial development of 7,000 sq.m at Garlick's Arch

I object to this proposal because it is superfluous. The requirement for employment space need ELNA 2015 is reduced by 80% from the 2014 plan. A 40ha site with planning permission is already available at Slyfield and this development could be easily and better accommodated there.

I object to this development on the grounds that there are already a number of rural businesses adjacent providing local employment. These would disappear if this development were to go ahead.

Send Hill

The proposal for 40 new homes at Send Hill and 2 travellers pitches

I object to this development because there is no requirement for these houses.

I object to the fact that this proposed development is in the Greenbelt in an area of beautiful countryside and there are no special circumstances which would make it necessary or desirable

I object to this proposed development on the grounds that subsoil on the site contains unsafe landfill waste. There is documented evidence to this effect and the site is currently vented with detectable methane emissions. Elderly residents who had close contact with the site report consequent health problems.

I object to the inclusion of 2 travellers pitches. The road is narrow and manoeuvring and achieving access for the large vehicles used by travellers would be impossible.

Clockbarn Nurseries, Tannery Lane

Proposal for 45 houses

I object to this proposal as there is no requirement for these houses.

I object also on the grounds that Tannery Lane is narrow and winding and this development in addition 64 homes which already have planning permission and the new Marina will create real problems for motorists as well as endangering cyclists and pedestrians

I object as this development will exacerbate problems at the Send Road/Tannery Lane junction which is already hazardous

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Clockbarn Nurseries, Tannery Lane

Proposal for 45 houses

I object to this proposal as there is no requirement for these houses.

I object also on the grounds that Tannery Lane is narrow and winding and this development in addition 64 homes which already have planning permission and the new Marina will create real problems for motorists as well as endangering cyclists and pedestrians.

I object as this development will exacerbate problems at the Send Road/Tannery Lane junction which is already hazardous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### The proposed development of 400 homes at Garlick's Arch

I object to the development of so many homes on this site. There is no proven need for this number of houses. It is inappropriate and will overload facilities in the village. There are no special circumstances which would support this development.

I object on the grounds that this site at Burnt Common floods every year. Building would create problems for other areas of the village and potentially the road networks as well.
I object to this development on conservation grounds and am surprised that it should be considered. The area is covered in ancient woodland with trees dating back 400 years.

The Proposed Industrial development of 7,000 sq m at Garlick's Arch

I object to this proposal because it is superfluous. The requirement for employment space need ELNA 2015 is reduced by 80% from the 2014 plan. A 40ha site with planning permission is already available at Slyfield and this development could be easily and better accommodated there.

I object to this development on the grounds that there are already a number of rural businesses adjacent providing local employment. These would disappear if this development were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4483  Respondent: 10859489 / Jennifer Procter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Garlick's Arch, Burnt Common

Proposed Interchange on the A3

I object to this policy because it will significantly increase traffic flow through Send. This is already at a standstill at peak hours and this will meant gridlock. The narrow through road with no capacity for widening means that there will be increased danger to cyclists and pedestrians and a further reduction in already polluted air quality.

I object to this policy because there has been no adequate transport assessment and the supporting evidence is sketchy, incomplete and unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4484  Respondent: 10859489 / Jennifer Procter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Send Hill

The proposal for 40 new homes at Send Hill and 2 travellers pitches

I object to this development because there is no requirement for these houses.

I object to the fact that this proposed development is in the Greenbelt in an area of beautiful countryside and there are no special circumstances which would make it necessary or desirable.

I object to this proposed development on the grounds that subsoil on the site contains unsafe landfill waste. There is documented evidence to this effect and the site is currently vented with detectable methane emissions. Elderly residents who had close contact with the site report consequent health problems.

I object to the inclusion of 2 travellers pitches. The road is narrow and manoeuvring and achieving access for the large vehicles used by travellers would be impossible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5734  Respondent: 10859489 / Jennifer Procter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ROADS, TRANSPORT AND INFRASTRUCTURE

I object to the lack of any solid proposals for roads to support any of the developments. Proper highway surveys have not been undertaken and the majority of stated potential undertakings are no more than aspirational at best and unachievable at worst. I do not believe such major structural requirements should be so ignored or again, handed as conditions to developers. It is not enough insurance and gives developers a potential free hand to begin housebuilding without these being in place. The result will be chaos.

I object to the fact that in its entirety this Draft Local Plan ignores the huge problems that will be generated throughout the Borough on the road networks and hubs, as well as through villages and on country roads.

I object that insufficient consideration has been given to the problems which will arise from pressure on public services, sewerage etc.

I object that not enough attention is paid to environmental aspects, particularly air quality which is poor currently and will be made a great deal worse as a result of increased traffic.

I object that there are misleading and incorrect references to bus timetables and services for the villages. These have been made to appear much more efficient than they actually are.

I object that there are references to increasing use of cycling as a means of transport when the lack of provision of cycle paths and the impossibility of providing them along tortuous, unlit narrow roads often bearing heavy traffic makes this a nonsense.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9772   Respondent: 10859489 / Jennifer Procter   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5732   Respondent: 10859489 / Jennifer Procter   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GREENBELT AND BROWNFIELD

I object to the fact that 70% of the building proposed in this Local Plan is in the Greenbelt and strung along the A3 where it will not only remove valuable countryside forever but will destroy the openness of the Greenbelt and effectively join up town and villages as well as creating impossible traffic congestion on the A3 and local roads.

I object to the relatively small amount of development for Guildford Town center and the complete failure of GBC to identify and promote sufficient brownfield sites within the urban area, where much more is possible. It almost completely ignores the proviso of 'brownfield first'. Walnut Tree Close, which represents a very real opportunity for housing provision has mysteriously become 'high flood risk' in this plan despite the fact that it is already built upon and new buildings continue to be constructed there. There are many ways to mitigate flood risk. It is interesting that this risk does not seem to be a bar to proposed rural sites, which flood regularly.

I object to GBC using taxpayer's money to buy consultancy, which continually fails to meet their objectives. The station development, another big opportunity for housing is constrained by very precise size and height requirements, which make it difficult for imaginative planning to apply. More imaginative approaches to the issues could achieve better results.

The concentration on retail in the town centre is a further restriction on housing provision. Guildford has adequate retail provision and there is no big demand for more. Retail is less and less needed as so much shopping is now done on line and this trend will continue. If Guildford wants more retail it would be wise to provide housing first and the demand for retail would follow. As it is, pushing development into the countryside will hugely increase external traffic coming to the centre and exacerbate the already congested access problems. Under this circumstance alone retail is likely to fail.

I object to the fact that this plan will fail to deliver anywhere near enough 'affordable housing' despite the promotional exercise on the GBC website where key workers talk of the benefits of the plan. This sort of PR, again at tax payers expense, is highly misleading. The lack of building in the town centre where key workers are most needed and access to work and public transport is available is an indictment of the intent. Guildford Borough is a commuting area and over building in the countryside will only create more commuters. Moreover this housing will not be 'affordable'. These will be executive homes and will be expensive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**SEND**

I object to all the proposals for development in Send on the grounds that none were included in the 2014 draft Local Plan and that these fundamental changes and last minute inclusions have not undergone proper consultation.

I object to the removal of Send and other villages from the Greenbelt. Send specifically and in conjunction with development at Gosden Hill is in the front line as a link village between Guildford and Woking. This plan to infill Greenbelt land will effectively join up the towns thus creating exactly the type of urban sprawl the Greenbelt was created to avoid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**DEVELOPMENTS AT WISLEY, GOSDEN HILL AND BLACKWELL FARM**

I object to the proposed developments for 2,000 homes at Wisley,

I object to the proposed development of 2,000 homes at Gosden Hill

I object to the development of 1,850 homes at Blackwell Farm.

These numbers are excessive. If allowed to proceed these developments will destroy Greenbelt and farmland and encroach on AONB's and SSCT's and make a mockery of Greenbelt legislation and pledges from Conservative ministers and councillors that they will 'protect the Greenbelt'.
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These numbers are excessive. If allowed to proceed these developments will destroy Greenbelt and farmland and encroach on AONB’s and SSC’s and make a mockery of Greenbelt legislation and pledges from Conservative ministers and councillors that they will ‘protect the Greenbelt’.

FINALLY

I believe this plan is ill conceived, uses misleading data and contains many fundamentally flawed assumptions and errors. I do not believe it can be achieved and as a template for the Borough going forward it gives a depressing glimpse of a chaotic future where a great deal will be lost for short term gain in the hands of the few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9764  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/684  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY II INFRASTRUCTURE AND DELIVERY

1.1 I object to the new Guildford Borough Council Transport Strategy 2017.

1.2 I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

1.3 If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

1.4 I object to SRN4 New A3/A3100 Burnham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

1.5 I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/3827  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICY A25 GOSDEN HILL

1.1 I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

1.4 The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

1.5 The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

1.6 The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

1.7 I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

1.8 The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

1.9 A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3828  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICY A26 BLACKWELL FARM

1.1 I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

1.4 The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

1.5 Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016). Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

1.6 The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

1.7 The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

1.8 The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worpleston and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

1.9 The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY A35 WISLEY

1.1 - **I object** to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 - **My previous objections therefore still stand for** this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 - There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 - This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 - Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3830  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICIES A36 to A41

1.1 I object to the changes to Policies A36 to A41 (East and West Horsley)

1.2 The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

1.3 Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

1.4 The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

1.5 No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.

1.6 The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

1.7 The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.
1.8 The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

1.9 Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

1.10 Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3831  Respondent: 10859489 / Jennifer Procter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICY A42 CLOCKBARN NURSERY

1.1 I object to the changed policy A42 Clockbarn Nursery to 60 homes.

1.2 It ignores all the hundreds of previous objections made by local people

1.3 The increase to 60 homes in place of 45 homes is 33% more and too much.

1.4 It will worsen access and traffic problems in Tannery Lane and at the A247 junction.

1.5 It will make erosion of Green Belt in our village worse

1.6 It will make surface water flooding, which is already bad, even worse

1.7 It will impact open countryside views from the River Wey Navigation

1.8 The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area.

1.9 The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.

1.10 Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.
1.11 Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

1.12 The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>pslp172/3832</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. POLICY A43 GARLICK’S ARCH

1.1 **I object** to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

1.2 It ignores all the **thousands of previous objections** made by local people

1.3 There is no proven demand for travelling show people plots in this location

1.4 There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.5 The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

1.6 This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

1.7 The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

1.8 Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

1.9 The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
1.10 I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

1.11 I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

1.12 I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

1.13 I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

1.14 I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

1.15 Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

1.16 Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

1.17 With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

1.18 The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

1.19 I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

1.20 Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

1.21 Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3833</th>
<th>Respondent:</th>
<th>10859489 / Jennifer Procter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1</th>
<th>POLICY A58 BURNT COMMON</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site</td>
</tr>
<tr>
<td>1.2</td>
<td>This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.</td>
</tr>
<tr>
<td>1.3</td>
<td>The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build</td>
</tr>
</tbody>
</table>
7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

1.4 There is in fact no justification for building anymore industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented. “

1.5 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

1.6 The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

1.7 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.8 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

1.9 The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.10 The impact on small surrounding roads will create traffic gridlock.

1.11 It will join up existing villages and defeat the purpose of the Green Belt.

1.12 The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

1.13 The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

1.14 The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

1.15 I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY D1 MAKING BETTER PLACES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 I object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design…”</td>
</tr>
<tr>
<td>1.2 There is no reasoned justification for this deletion and its omission will not make places better.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1949  **Respondent:** 10859489 / Jennifer Procter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E1 SUSTAINABLE EMPLOYMENT**

1.1 I object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

1.3 It is effectively an old non-conforming user in an area of outstanding countryside

1.4 It is adjacent to the beautiful Wey Navigation

1.5 There is highly restricted vehicular access along Tannery Lane in both directions

1.6 Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

1.7 I object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

1.8 It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision

1.9 The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
1.10 There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units.

1.11 The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt.

1.12 There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl.

1.13 The impact on small surrounding roads will create traffic gridlock.

1.14 It will join up existing villages and defeat the purpose of the Green Belt.

1.15 I also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate.

1.16 I object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

1.17 I object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

1.18 GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

1.19 What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

1.20 The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

1.21 Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

1.22 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space."

"1.23 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.24 Little regard is still not given to the opportunity of specific B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.
1.25 I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

1.26 We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

1.27 We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1 POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

1.1 I object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy.

1.2 I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1952  Respondent: 10859489 / Jennifer Procter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICY E4: SURREY RESEARCH PARK

1.1 I object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017.

1.2 I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park.

1.3 I object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

1.4 I also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary.

1.5 Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

1.6 There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

1.7 Research parks that lose their way stop being the location of choice for new innovative enterprises.
1.8 The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

1.9 Monitoring indicators should include new start-ups and new patents created

1.10 Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

1.11 The Surrey Research Park currently extends to 65,000 sq m

1.12 The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1953  Respondent: 10859489 / Jennifer Procter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 POLICY E7 TOWN CENTRE

I object to the changes in Policy E7 Guildford Town Centre

1.2 I am of the opinion that policy E7 is still very ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

1.3 Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

1.4 The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site.

1.5 However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of
shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.1.6

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report.

1.7 The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in non-store retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.”

1.8 The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research!

1.9 The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But I then I realise this statement applies to any of 100 centres in the UK. I am concerned as to whether the authors of this retail study have actually visited Guildford or know where it is?

1.10 In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

1.11 The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

1.12 The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

1.13 I also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough. There is still a blind over concentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See the Town Centre Opportunity in next section.
1.14 **I object** to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high quality public realm. We will put people above traffic and we will promote new high quality retail and business development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders.” Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the failure of the potential for imaginative Town development in this latest draft plan.

1.15 I support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development.

1.16 **I object** to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive brownfield development extending to 2551 homes including Woodbridge Meadows as a residential development site.

1.17 I do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

1.18 The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity for at least 5,000/7,500 homes.

1.19 The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

1.20 Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. **But first** we must know how many we need to accommodate and make 100% use of our urban brownfield in the town before we consider building in the Green Belt or countryside.

1.21 Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on brownfield land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp171/1944  Respondent: 10859489 / Jennifer Procter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1  POLICY H1 HOMES FOR ALL

1.1  I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2  I object to the change by way of deletion of the paragraph on density: “ New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

1.3  This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

1.4  I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1.5  I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

1.6  The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.7  I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

1.8  I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

1.9  I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the
local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp171/1945  Respondent: 10859489 / Jennifer Procter  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H2 AFFORDABLE HOMES**

1.1 **I object** to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity. North Downs Housing Ltd set up last February by the council and run by councillors to “tackle the shortage of homes in Guildford and in particular, the shortage of affordable homes and a mixture of other tenures that are ‘affordable to everyone’ “ seems to be missing the point when the stated aim is to let to people with incomes above £30,000 a year. Affordable homes are desperately needed for all those workers who earn less than £30,000 a year and this again begs the question regarding the ambition and direction of GBC when it comes to planning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp171/1946  Respondent: 10859489 / Jennifer Procter  Agent:
1 POLICY H3 RURAL EXCEPTION HOMES

1.1 **I object** to the change in policy H3 Rural Exception Homes.

1.2 **I object** to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

1.3 This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1 POLICY P2 GREEN BELT

1.1 **I object** to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 **I object** to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

1.3 **I object** to the proposed change that **Send Business Park** should be inset from the Green Belt due to the fact that:

1.4 It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation

1.5 It has restricted access along Tannery Lane

1.6 It should not be given the opportunity for further expansion or development
1.7 Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

1.8 Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

1.9 It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

1.10 I object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that Send and a further list of 13 villages are “now inset from the Green Belt”.

1.11 This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt!

1.12 I object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

1.13 I am deeply disturbed that settlement boundaries are to be hugely extended in many villages (particularly at Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN.

1.14 Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

1.15 Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. Yes, it is true that Send comprises old ribbon development but this should not mean it can be removed from the Green Belt so that Woking joins up to Guildford. The village and the countryside behind the A247 should all be protected.

1.16 I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:

1.17 The land behind the schools including playing fields and woodland.

1.18 The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.

1.19 Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

1.2 The OAN “objectively assessed need” figure of 12,426 is far too high

1.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

1.5 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

1.6 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.7 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.8 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.
1.9 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

1.10 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

1.11 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

1.12 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

1.13 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

1.14 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

1.15I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

1.16 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

1.17 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

1.18 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

1.19“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

1.20 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

1.21 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.
1.22 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3520 Respondent: 10859489 / Jennifer Procter Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 GENERAL POINTS

1.1 I have focused, as requested, on changes.

1.2 I object to the plan because it does not address local need and the changes do not take account of my own previous objections or the thousands of other valid objections made by residents of Send and other areas to the 2016 version. It appears that GBC is predetermined to release huge tracts of Green Belt land for development and to push through this agenda despite all reasoned opposition. This makes a mockery of public consultation and the notion that local people have a say in what happens with regard to local planning.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.5 I object that the GBC decision not to apply constraints. This could mean that GBC is required to take overspill from neighbouring Boroughs that are themselves applying constraints. Send and neighbouring villages are the Green Belt between Woking and Guildford. It is nonsense to suggest that Woking Green Belt will be protected if the proposed developments in Send, and at Gosden Hill go ahead, as they will effectively join up the two towns and do away with the greenbelt separation for both.

1.6 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have done. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.7 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.
1.8 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed, while in the region of 40% is to be situated on Greenbelt land in the East of the Borough. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development”. This is normally an integral part of forward planning and development control.

1.9 Very little, if any or the proposed Greenbelt development will provide the affordable accommodation the country and local people so badly need. At 80% of market value on Greenbelt land around London with further reductions in quantity likely when developers play the viability card the stated purpose of the whole exercise will be lost. The SHMA (West Surrey Strategic Housing market Assessment, September 2015, Final Report) pg. 97, section 6.55 highlights “the analysis above indicates a notable need for affordable housing...” and Table 44 states that the proportion of affordable housing need as a % of the total need is 88%. GBC’s plan will not deliver this. Creating ever more unaffordable housing will put greater strain on local essential services and require more of the type of people least likely to afford the housing. (shop workers, nurses etc). This further undermines the sustainability of the plan, and once more highlights GBC’s intent to build more houses in flagrant violation of best planning practice. The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.10 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.11 In my opinion much of the updated local plan is not up to date in current trends. The well reported and acknowledged decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs have been largely ignored.

1.12 Assertions that there is real demand for the expansion of retail, industrial or office space lack credibility. Significant planned expansion of residential development in the town centre is universally acknowledged as a key stimulant for urban economic growth and health. Without this the town could suffer further stagnation and serious economic loss.

1.13 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.14 I regret that my conclusion is that this plan is fundamentally unsound and a clear example of bad planning.

2 EVIDENCE BASE

2.1 I object to the fact that the evidence base is poor and that there is a lack of sound property market research relating to the local market in Guildford. To rely, as previously, on generic economic capacity forecasts means that many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2.2 Key parts of the evidence base are flawed or based on withheld assumptions.

2.3 The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

2.4 An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.
2.5 Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

2.6 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

2.7 38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

2.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

2.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

2.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

2.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3791  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]
The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have a significant impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions.
during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3792  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:
failure to correct for errors in the historical data for international migration flows,
issues with the way it considers students and affordability, and
flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Maps

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog's Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called 'Guildford Urban' which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7156  Respondent: 10859553 / MARK Curtis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Question 6: The content of the plan

I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

1. The southern slopes of the Hog’s back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
2. Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
3. The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
4. Blackwell Farm is very effective in fulfilling the functions of Green Belt.
5. Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
6. More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
7. The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
8. Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB.” I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.
The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7158  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A55

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to ‘enable delivery’. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16030  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 MAKING BETTER PLACES

I object to Policy D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16032  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2 SUSTAINABLE DESIGN

I object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.
This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16033  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 HISTORIC ENVIRONMENT

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16036  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 DEVELOPMENT IN URBAN AREAS

I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E1 SUSTAINABLE EMPLOYMENT

I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).
Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**POLICY E2: LOCATION OF EMPLOYMENT FLOORSPACE**

I object to policy E2 location for new employment floor space

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Bel.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.
The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16020  Respondent: 10859553 / MARK Curtis  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 MAINTAINING EMPLOYMENT CAPACITY

I object to Policy E3 maintaining employment capacity

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats.
Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/16004</th>
<th>Respondent: 10859553 / MARK Curtis</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/16023</th>
<th>Respondent: 10859553 / MARK Curtis</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
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</table>
POLICY E4: SURREY RESEARCH PARK

I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park.

The Surrey Research Park currently extends to 65,000 sq m.

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.
The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16025  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY E5 RURAL ECONOMY

I object to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16028  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
POLICY E6 LEISURE AND VISITOR EXPERIENCE

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H1 HOMES FOR ALL

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16010  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 AFFORDABLE HOMES

I object to policy H2 Affordable homes.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will
stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY H3 RURAL EXCEPTION HOMES

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16011 Respondent: 10859553 / MARK Curtis Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPP16/16041 Respondent: 10859553 / MARK Curtis Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY II INFRASTRUCTURE AND DELIVERY

I object to policy I1 Infrastructure and delivery

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer’s obligation to sell a percentage of homes at 20% below market value.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem.

The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.

Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because
the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5..indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3)

Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.
Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16042  Respondent: 10859553 / MARK Curtis  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 DEPARTMENT FOR TRANSPORT

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy”

This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 SUSTAINABLE TRANSPORT

I object to policy I3 Sustainable transport for new developments. This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town.

I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P1 AONB**

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The need to apply constraints

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the
borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16013  **Respondent:** 10859553 / MARK Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

**POLICY P2 GREEN BELT**

I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16014  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3 COUNTRYSIDE

I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16015  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P4 FLOOD RISK

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY P5 SPAs

I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies**

**POLICY S1 SUSTAINABLE DEVELOPMENT**

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/16005  Respondent: 10859553 / MARK Curtis  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16007  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 PLANNING FOR THE BOROUGH

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough...
should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than
in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the
urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for
housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30
years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional
review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics
procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693
homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it
relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over
separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA
report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed
together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing
need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an
independent adviser and commentator on housing demographics. He works with local authorities and others on the
estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the
last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years
as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National
Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to
allow for improving affordability of housing, increased student numbers and economic growth. The report found that none
of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other
matters that:

· The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the
demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the
area.

· There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high
and that an adequate provision for students is already included in the demographic OAN. The report advises that the
Council should commission a separate student housing need figure for Guildford given the distorting effect of students on
our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be
likely to reduce still further.

· The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate
assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the
Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions
consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the
demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs
growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from
Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry
out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced
from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This
would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18614  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1769  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 2: Legal compliance

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.
The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1770  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Question 3: Soundness

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.
A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit - June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.
GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.
No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**Question 4: Duty to cooperate**

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green/belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Question 5: Examination

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1773  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 7: Any other comments?

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'
May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1626   Respondent: 10859585 / Irene Grainger   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to The Garlick's Arch proposal to build 400 houses and 7000 sq.metres of light/general industrial/storage distribution space on the green belt

I hope all my comments will receive proper consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3580   Respondent: 10859585 / Irene Grainger   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increase flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the number of homes that the Plan intends to deliver as this will be unacceptable as our local schools are already over subscribed, it is already extremely difficult to get a doctors appointment now without any extra people coming to our village!

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate and would certainly be made worse with the planned development. The number of heavy lorries using Potters Lane is already a grave danger to the residents but nothing has been done to alleviate this problem and now the planners want to make the situation much worse by their proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal in the local plan on the grounds that it would have serious and unwanted impact on the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3581  **Respondent:** 10859585 / Irene Grainger  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal in the local plan on the grounds that Send is in green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp17/676  **Respondent:** 10859585 / Irene Grainger  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes is totally unacceptable, especially as I felt 45 was too many
- It ignores all the previous objections raised by the local people
- It will seriously worsen access and already unacceptable traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding a much more serious threat than it already is
- It will impact countryside views from the River Way Navigation and will greatly affect the wildlife

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
At the proposed site of Garlick's Arch, I object to Policy A43 for the following reasons:

- It ignores all the thousands of previous objections made by local people.
- There is no proven demand for Travelling Showpeople in this location, which would seriously affect the value of properties.
- It is beautiful permanent Green Belt and "no exceptional circumstances" exist.
- It will cause serious implications to the village and the number of proposed homes is excessive as our schools are already stretched to their capacity.
- It is exquisite ancient woodland that existed at the time of Elizabeth 1 so should always be preserved.
- It will join up Ripley and Send and defeat the key purpose of Green Belt.
- It is already subject to frequent flooding and is currently a flood zone 2 allocation.
- It is contaminated by lead shot accumulated over more than fifty years.
- It will generate excessive traffic that will block up the local roads of Send and Ripley which are already at an unacceptable level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A58 at Burnt Common because:-

It was deleted from the 2014 draft because of all the objections made previously

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since then there has been a decline in demand for industrial land

There is definitely no need to build industrial or warehouse development in the middle of the Green Belt when both Slyfield and Guildford still have empty sites and industrial units

the 2017 Employment Land Need Assessment clearly shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt

The impact on small surrounding roads will create a serious and unacceptable traffic gridlock

It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/78  Respondent: 10859585 / Irene Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15.

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate and definitely unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3099  Respondent: 10859809 / Mary Branson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send village being removed from the Green Belt. There are no special circumstances that justify the change. Once this status is changed you will destroy precious countryside forever. It cannot be reversed.

I OBJECT to the plan to build 400 houses at Garlicks Arch. Guildfords housing requirement has been exaggerated, and is non transparent and undemocratic. Proper use of brown field sites would be sufficient.

I OBJECT to 45 houses at Clockbarn Nursery. Inadequate access and insufficient consideration of traffic volume.

I OBJECT to houses and travellers pitch at Send Hill. Insufficient access and destruction of countryside. Unsafe landfill waste not considered.

I OBJECT to interchange at A3 Burnt Common. Overloaded roads, and noise and air pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2555  **Respondent:** 10859809 / Mary Branson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore I strongly object Policy A42

The increase to 60 homes in place of 45 homes is 33% more and too much.  It will make erosion of the Green Belt in our village worse.  It ignores the hundreds of objections made by our village.  It will cause traffic problems in Tannery Lane at the junction of Tannery Lane and A247.  It will make surface water flooding, which is already a problem, even worse.  It will interrupt the open countryside views.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp172/2556  Respondent: 10859809 / Mary Branson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A43

It ignores the thousands of previous objections made by local people.

There is no proven demand for Travelling Show people plots in this location.

It is permanent Green Belt and no ‘exceptional circumstances exist.

It is ancient woodland that existed at the time of Elizabeth 1

It will join up Ripley and Send and defeat the key purpose of the Green Belt

It is subject to frequent flooding and is currently a flood zone 2 allocation

It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2557  Respondent: 10859809 / Mary Branson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A58

There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not a huge over allocation of 10 hectares at Send in the Green Belt.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.
Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

It is an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation.

There is highly restricted vehicular access along Tannery Lane in both directions.

Further expansion of development at this location detracts from the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6397  Respondent: 10859873 / Mat Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 45 houses at Clockbarn Nursery. Inadequate access and insufficient consideration of traffic volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6396  Respondent: 10859873 / Mat Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the plan to build 400 houses at Garlicks Arch. Guildfords housing requirement has been exaggerated, and is non transparent and undemocratic. Proper use of brown field sites would be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6399  Respondent: 10859873 / Mat Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to interchange at A3 Burnt Common. Overloaded roads, and noise and air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I would like to register my objection to the removal of green belt status of the land in Normandy (A 46) to facilitate the proposed development.</td>
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<td>Schools in the area have spare capacity to take many more pupils and are prepared to expand their existing sites.</td>
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<td>The roads in the locality are already overloaded and regularly jam during peak hours. The increase in traffic due to the school, housing and lorries from the travellers site would be massive.</td>
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<td>The main sewer running across the area overflows raw sewage from the manholes in winter exacerbated by frequent flooding at times of high rainfall.</td>
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<td>Site A46, the land between Glaziers Lane and Westwood Lane is productive farmland with hedges, ancient woodland and hay meadows supporting a diverse range of wildlife which would be decimated by this development.</td>
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<td>With the proposed building to the West of Guildford (Blackwell Farm etc.) there would be almost continuous urbanisation to Aldershot changing the rural character of Normandy and Flexford forever.</td>
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<td>Removal of the land(A46) from the greenbelt is unnecessary and cannot be justified. Developing smaller sites around the locality would be a better solution to satisfy the need for new housing.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: pslp172/4781</th>
<th>Respondent: 10859969 / R C Pike</th>
<th>Agent:</th>
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</thead>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: